To: Honorable Judge Paul G. Gardephe, U.S.D.J. - SDNY

From: Brandon Green Reg. No. 56400-054

Defendant, Pro Se

cc: Attorney Steven Witzel; Office of AUSA;

Re: Case No. 16 Cr. 281--002 (PGG)

COVER LETTER; AND CERTIFICATE OF SERVICE

Dear Judge Gardephe,

Thank you for your time. I'm writing to inform you that I've sent herewith: An Affidavit and Motion to Recuse, as well as a Motion to Reconsider, with an Index to Exhibits for those pleadings, and my Affidavit in Support of my IAC and other post-conviction claims. Please upload these documents to my case docket if they have not been so already and move forward with addressing the same in due form of law. Thank you for your time.

Please take notice that this cover letter also serves as my Certificate of Service, to certify that I also sent a copy of all the accompanying documents to, inter alios, the Office of the United States Attorney, via U.S. Mail, on this 23rd day of February 2021.

Respectfully Submitted,

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Brandon Green Reg. # 56400-054

Defendant, Pro Se

MDC - Brooklyn

P.O. Box 329002

Brooklyn, New York 11232

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT of NEW YORK
X
UNITED STATES OF AMERICA,
Plaintiff,
- against -
BRANDON GREEN, et al.,
Defendant, Pro Se.
X
Case No. 16 Cr. 281002 (PGG)
CERTIFICATE OF GOOD FAITH
(28 U.S.C. Sec. 144)
(20 0.3.0. 360. 144)
I, Steven Witzel, Esq., being the Attorney duly appointed as Stand-by Counsel in this matter for the Pro Se Defendant, Brandon Green, do hereby submit this Certificate of Good Faith, under 28 U.S.C. Section 144, to Certify that I've read the accompanying Affidavit of recusal, and that such is being submitted in Good Faith.
SUBMITTED on this day of February 2021.
Respectfully Submitted,
Steven Witzel, Esq.
Stand-by Counsel
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INITED STATES DISTRICT COURT
OUTHERN DISTRICT OF NEW YORK
X
JNITED STATES OF AMERICA,
Plaintiff,
- against -
BRANDON GREEN, et al.,
Defendant, Pro Se.
X
Case No. 16 Cr. 281002 (PGG)
AFFIDAVIT OF FACTS IN SUPPORT OF RECUSAL (28 U.S.C/ Section(s) 144, 455(a), 455(b)(1)
- and -

### 1. Introduction

The defendant, Brandon Green, Pro Se, submits this Affidavit, under Title 28 U.S.C. Section(s) 144, 455(a), 455(b)(1), and U.S. Code Jud. Conduct, Canon(s) 1, 2(A), 3 et seq., to respectfully move the Judge assigned to this case, the Honorable United States District Court Judge, Paul G. Gardephe (hereafter "the Judge"), to recuse himself, and allow for the appointment of another Judge, because of, inter alia, the apparent personal bias and prejudice harbored by the Judge against Mr. Green. Furthermore, Mr. Green submits that this Affidavit, and more specifically, the facts within, are also submitted to support the accompanying motion for reconsideration. [FN 1] The Facts and Relevant Information supporting this Affidavit are as follows:

AFFIDAVIT OF FACTS IN SUPPORT OF RECONSIDERATION (Local Criminal Rule 49.1(d))

- II. Facts and Other Relevant Information
- 1. Mr. Green will only be submitting the facts and information that he feels is relevant to understanding his arguments and claims raised herein, and in the accompanying papers [FN 2];
- 2. On or about March 28, 2019, following a five (5) week trial, Mr. Green was found guilty of the following (3) three counts listed in the indictment(s) against him in this case, to-wit: Count-One: Racketeering Conspiracy, Count-Four: Narcotics Conspiracy, and Count-Five: Use and/or Possession of Firearms in Connection with Narcotics Conspiracy;
- 3. For trial, Mr. Green was represented by the attorney(s), Eric R. Breslin, and Melissa S. Geller, of the Law Firm of Duane Morris (hereafter collectively referred to as "trial counsel", unless otherwise stated by their respective names);
- 4. Approximately two (2) months after Mr. Green's trial ended, because of concerns he had with how trial counsel had handled his case, and with their post-trial submissions, and due to his ever growing concerns regarding the violations of his rights that were taking place, to include Government misconduct, Mr. Green, after trial, sent the Judge a written submission, titled: "[A]mended [D]eclaration In Support of Rule 29, [and] 33 [M]otion[(s)]" (hereafter "the Supplemental Declaration");
- 5. In the Supplemental Declaration, Mr. Green informed the Judge of several of the grievances he had regarding this Case;
- 6. In the Supplemental Declaration, Mr. Green brought to the Court's attention that there is fourth amendment concerns surrounding the traffic stop that he was involved in, on August 3, 2010 (hereafter "the Traffic Stop"), that was introduced at trial here; specifically, Mr. Green stated that the traffic stop was dismissed under the Fourth Amendment, and that he received over \$30,000.00 from a civil lawsuit that stemmed from the violations of his rights that occurred that day [FN 3];
- 7. Mr. Green also stated in the Supplemental Declaration that he reviewed trial counsels post-trial Rule(s) 29 and 33 Submissions (hereafter "Trial Counsel's Rule(s) 29/33 Submissions") (Doc. No. 639), and that "[C]ounsel still fails to incorporate my issues". Quoting the Supplemental Declaration, Pg. 7;

- 8. The Supplemental Declaration was dated, May 23, 2019, and was sent to the Court, via legal mail at the Metropolitan Detention Center (MDC), in Brooklyn, New York, by Mr. Green on that same day (i.e., 05/23/2019);
- 9. On June 18, 2019, the Supplemental Declaration was filed (see Doc. No. 665);
- 10. Less than two (2) months after filing the Supplemental Declaration, Mr. Green sent a pleading to the Judge titled: "Motion for Stay / Continuance" (hereafter "the First Stay Request"); which was filed in Mr. Green's Case Docket on July 11, 2019;
- 11. In the First Stay Request, Mr. Green "again" informed the Judge that he was not satisfied with trial counsels performance; specifically, Mr. Green stated, that trial counsel failed to go over with him their post-trial submissions prior to filing them, and did not incorporate the arguments that he requested be made;
- 12. In the First Stay Request, Mr. Green also informed the Judge that he was "in the process of and is putting forth due diligent effort with respect to researching and presenting all of the meritorious issues and arguments that were not raised by [trial counsel] in the[ir] Rule 29 and 33 Pleadings" (quoting the First Stay Request, Pg. 2, Para. 11);
- 13. Furthermore, Mr. Green argued to the Judge in the First Stay Request that: "there is a reasonable probability that he would be prejudiced if [trial counsel] does not make the[] changes [he requested be made to their post-trial submissions]; and[,] that failure to do so would be considered grounds for collateral attack of his judgment and conviction due to claims of, among other [C]onstitutional violations, ineffective assistance of counsel and due process of law" (Quoting Id., at Para. 12);
- 14. Therefore, Mr. Green Submitted to the Judge in the First Stay Request that in order "to reduce and hopefully remove the...prejudices suffered by Mr. Green, ... a STAY in the[se] proceedings and a continuance with regards to his currently scheduled sentencing date is needed" (Quoting Id., at Para. 13) (Emphasis in Original);
- 15. The Judge never addressed Mr. Green's claims raised in the First Stay Request, and in the Supplemental Declaration, relating to Mr. Green's contentions that Trial Counsel was ineffective;

- 16. Because the Judge would not address the claims raised by Mr. Green, mentioned above, Mr. Green's family decided to hire a different attorney for Mr. Green, and to have the new attorney move to replace Trial Counsel;
- 17. To replace Trial Counsel, Mr. Green's family hired the Attorney, Zoe Dolan, from California;
- 18. At the Substitution of Counsel Hearing held on July 25, 2019 (hereafter "the Substitution Hearing"), the Judge stated to Ms. Dolan, regarding trial counsel and their overall representation of Mr. Green, that he (the Judge) felt that Mr. Breslin and Ms. Geller had performed "admirably"; specifically, the Judge stated:

THE COURT: ... . I will say that I think both Mr. Breslin and Ms. Geller performed ADMIRABLY throughout their entire representation of Mr. Green, both in terms of their in-court performance as well as their written materials. So, I think that Mr. Green has been the BENEFICIARY OF EXCELLENT REPRESENTATION up to now.

Transcript of the July 25 Substitution Hearing, Pg(s). 5-6 (Emphasis Added);

- 19. Prior to and after hiring Ms. Dolan, Mr. Green informed her of all the issues that he had in this case; and, he informed her that he wanted to raise these issues (e.g., ineffective assistance of counsel and prosecutorial misconduct) prior to sentencing;
- 20. The issues Mr. Green brought to Ms. Dolan's attention concerned the violations of his rights that took place prior to, during, and after trial; and, moreover dealt with a myriad of claims ranging from ineffective assistance of counsel, to Government misconduct and Judicial Misconduct;
- 21. In response to being told these issues by Mr. Green, Ms. Dolan responded by stating that those claims are to be raised in a Section 2255 petition. Specifically, in one email from Ms. Dolan to Mr. Green, Ms. Dolan states that: "To emphasize what I was saying earlier, I think that most of your arguments are better suited for a 2255. For the most part, you are...pointing out shortcomings of your trial counsel and that is precisely what 2255s are for";
- 22. About two (2) months after Ms. Dolan was assigned to this Case the Judge ruled on trial counsel's Rule(s) 29/33 Submissions, prior to Ms. Dolan and Mr. Green's filing of any amended/supplemental claims and other relevant information. See the Judge's Memorandum Opinion & Order, United States v.

Johnson, et al., 2019 U.S. Dist. LEXIS 160088 (Decided September 16, 2019) (in denying Trial Counsel's Rule(s) 29 and 33 Submissions, the Judge did not address any of Mr. Green's issues and arguments expressed in his Pro Se Submissions received and reviewed by the Judge prior to aforementioned Memorandum Opinion & Order;

- 23. Mr. Green did not fully agree with Ms. Dolan's advice, so he attempted to bring his concerns to the District Court's attention in a Pro Se Sentencing Memorandum (hereafter "the Sentencing Memorandum") (Doc. No. 760), which Mr. Green filed with the Court on October 30, 2019, a day before his then scheduled sentencing;
- 24. On October 31, 2019, at the Sentencing Hearing, the Judge stated, regarding its receipt of the Sentencing Memorandum, that:

THE COURT: Good afternoon. This matter was on my calendar for the purposes of sentencing. Yesterday afternoon I received a[]... letter from Mr. Green in which he raises a wide variety of legal and factual complaints about his trial and his lawyer's performance at that trial. These arguments are different from arguments that were made in Mr. Green's first set of pretrial motions. They are also different than arguments that Ms. Dolan made in a second series of post-trial motions. Based on that fact, I adjourned the sentencing.

Transcript of October 31, 2019 Sentencing Hearing (hereafter "Oct. 31 Sent. T."), Pg. 2 LL 9-19;

- 25. Ms. Dolan, for the most, objected to the postponement of Mr. Green's sentencing by the District Court, see Oct. 31 Sent. T. Pg.(s). 1-6, and she insisted that a Faretta hearing was in order to address Mr. Green's desire to proceed forward with his post-trial conviction claims. See Id. Pg. 6 LL 10-18;
- 26. The Judge went on to state, despite Ms. Dolan informing the Court that Mr. Green wished to pursue his Sentencing Memorandum Claims, that:

THE COURT: So it seems like what would make most sense at this point is for you and Mr. Green to consult and then for me to hear from you in a letter how it is you wish to proceed, whether Mr. Green is going [to] want to address the various matters that he lays out in his brief, whether instead he's going to rely on you for the arguments that you think are meritorious, but at this point we really don't know --

27. Ms. Dolan immediately responded, to again inform the Court that they did in fact already know how Mr. Green wished to proceed:

MS. DOLAN: He's pretty adamant that he wishes to press that. He also has some further exhibit[s] and he's requested some more from the government, so I think Mr. Green's position is firm.

Id. at LL 14-17;

- 28. Ms. Dolan then goes on to inform the Judge that she "consulted with Mr. Green, and he affirms that he wishes to press those issues", Id. Pg. 8 LL 6-7; and, She then backed down from her earlier protest of the postponement of Mr. Green's sentencing. See Id. at LL 7-8;
- 29. Ms. Dolan went on to explain to the Judge that she had an upcoming trial, and obviously her schedule was restricted for the upcoming weeks, see Id. at LL 9-13; moreover, other than this, Ms. Dolan was willing to try and work with Mr. Green in this matter so that he can address all of his claims. See Id. Pg. 8 LL 6-13;
- 30. In response to Ms. Dolan's statement above, the Judge stated, inter alia, that:

THE COURT: We can work around your schedule obviously, but I want to lay out a couple of concerns I have. Ordinarily, the way ineffective assistance, procedurally the way it is addressed is, generally speaking, there is a direct appeal in which a defendant raises claims of error, either in the jury instructions or evidentiary rulings of the judge. Sometimes a defendant will seek to raise ineffective assistance claims on the direct appeal. In that event, the circuit court generally sends those claims back with the instruction that if the defendant wishes to pursue ineffective assistance [of counsel claims] they can file a section 2255 motion and raise their claims there. The justification for that is a record hasn't been developed in the district court.

Id. at Pg.(s). 8-9;

31. The Judge then goes on to state:

"So my concern is that I now have a Rule 29 and a Rule 33 motion pending before me. A defendant has already raised claims of ineffective assistance of counsel, because there's been a change of counsel. 'Ms. Dolan has come in to represent Mr. Green in place of Mr. Breslin and Ms. Geller, who represented him at trial. So , it is unusual , the situation we find ourselves in. I haven't researched the matter, but my gut instinct is that it would BEHOOVE ME TO EXPLORE the claims of INEFFECTIVE ASSISTANCE NOW, given that they're already before me... .

Id. at Pg. 9 LL 5-15;

32. The Judge continued by stating some of the things that would be required by Mr. Green, in the event that the District Court were to decide to proceed forward with addressing his claims - prior to sentencing - of, inter alia, ineffective assistance of counsel; and, one of those requirements was that Mr. Green would have to "Waive" the "Attorney-Client Privilege":

THE COURT: ... . In the event that [the District Court were to hear the ineffective assistance of counsel claims prior to sentencing, if] that is the correct approach, the procedure would be that Mr. Green would be required to WAIVE the ATTORNEY-CLIENT PRIVILEGE obviously because I would need to hear from Mr. Breslin and Ms. Geller about the various claims and allegations that Mr. Green has made against them. So he would be required to agree to WAIVE the ATTORNEY-CLIENT PRIVILEGE. That would HAVE TO BE IN WRITING. Then I would likely request declarations or affidavits from Mr. Breslin and Ms. Geller, and it's quite possible I would want to hold a hearing on the allegations.

ld. Pg. 9-10 (Emphasis and Interpolation Added);

- 33. The Judge goes on to again state that he would like a letter from Ms. Dolan within a week advising the Judge of whether or not her client, Mr. Green, wished to pursue his ineffective assistance of counsel and other claims associated with the Sentencing Memorandum, see Id. Pg. 10 LL 10-15; and, in Mr. Green's decision was still to pursue those claims, the Judge said: "then I will likely ISSUE AN ORDER requiring Mr. Green to WAIVE the ATTORNEY-CLIENT PRIVILEGE so that I can seek affidavits, declarations from Mr. Breslin and Ms. Geller addressing MR. Green's allegations of ineffective assistance and misconduct on behalf of or committed by his attorneys at the trial." Quoting Id. Pg. 10 LL 16-20;
- 34. The Judge went on to continue to ask Ms. Dolan if a week would be enough time for her to submit a letter stating Mr. Green's position, see Id. at LL 22-24;

- 35. Ms. Dolan responded to the Court's inquiry by informing the Court that she felt that a week was sufficient, Id. Pg. 11 LL 2-3; and, she went on to advise the Judge that Mr. Green had already "confirmed that that is how he would wish to proceed." Id. at LL 3-4;
- 36. In spite of the Judge asking Mr. Green/Ms. Dolan nearly fifteen times if he wished to purse his claims of, inter alia, ineffective assistance of counsel and government misconduct, Mr. Green stood firm in his desire to address these concerns; therefore, the District postponed Mr. Green's sentencing for a later date, in light of the fact that it would likely be hearing Mr. Green's complaints prior to sentencing:

THE COURT: OK. Until we know how we are proceeding, that is to say whether a hearing is going to be necessary on ineffective assistance of counsel allegations, I think it's foolish for me to set a sentencing date, because it seems to me we are probably far away from sentencing at this point if I am going to have to have a hearing on ineffective assistance of counsel.

ld. Pg. 13 LL 9-15;

- 37. On the day of the Sentencing Hearing, after it was over, Ms. Dolan wrote a letter to the Judge (Doc. No. 758), wherein she again stated that she felt a Faretta Hearing was necessary, as it relates to Mr. Green's claims raised in, among other pro se filings, the Sentencing Memorandum;
- 38. Then, on November 7, 2019, one week after the Sentencing Hearing, per the Judge's request, Ms. Dolan submitted another letter to the Judge (Doc. No. 767), stating "again" that she felt the Judge should conduct a Faretta hearing regarding Mr. Green's post-conviction claims;
- 39. The next day, the Judge issues an Order (Doc. No. 771) (hereafter "the Nov. 8 Order"), directing the parties to brief the Court on whether now, during this stage of the proceedings i.e., post-conviction, but pre-sentencing, after trial was it proper for the District Court to address Mr. Green's claims of, inter alia, ineffective assistance of counsel (IAC);
- 40. In response to the Nov. 8 Order, Ms. Dolan submitted another letter to the Court, reflecting her "third request for a Faretta Hearing" (Doc. No. 777) (hereafter "Ms. Dolan's Nov. 22 Letter"); wherein, Ms. Dolan maintained her position that a hearing under Faretta, supra, was necessary to address Mr. Greens claims raised post-conviction;

41. In Ms. Dolan's. Nov. 22 Letter, she stated, regarding Mr. Green's desire to address his post-conviction claims, that:

"In any event, Mr. Green has conveyed an unequivocal request to represent himself in pursuit of his claims going forward, and I understand he intends to make his own submissions in response to the November 8 Order. I remain available for a Faretta hearing by phone at everyone's earliest convenience."

Quoting Ms. Dolan's Nov. 22 Letter;

- 42. The Government responded to the Nov. 8 Order, on November 22, 2019 (Doc. No. 778) (hereafter "Gov. Resp. to Nov. 8 Order"), arguing, for the most part, that the District Court should not address Mr. Green's IAC and other post-conviction claims prior to sentencing, but instead should proceed forward with sentencing;
- 43. In the Gov. Resp. to Nov. 8 Order, the Prosecution glaringly lied / misstated the facts/record, regarding Mr. Green's claims that trial counsel was ineffective for not challenging the introduction at my trial against me the alleged evidence associated with the August 3, 2010, Traffic Stop;
- 44. The Prosecution incorrectly stated, with regard to this argument, that Mr. Green -in the Sentencing Memorandum -: "...argues that [T]rial [C]ounsel failed to locate court records that would reflect the disposition of the [T]raffic [S]top, establishing that the Bronx District Attorney's Office dismissed its charges against the defendant . (Id.)". Quoting Gov. Resp. to Nov. 8 Order, Pg. 6 (Citation in Original: The Prosecution "claimed to be citing Mr. Green's Sentencing Memorandum");
- 45. What Mr. Green actually said in his Sentencing Memorandum was that Trial Counsel was ineffective for not challenging, via a suppression and or limine motion, the alleged evidence associated with the traffic stop, in light of the fact that Mr. Green informed trial counsel that the original case was dismissed against himself and the other defendants because of the violations of their rights that took place during that incident, to include violations to Mr. Green's protection against unreasonable searches and seizures;
- 46. Never did Mr. Green make any mention of the Bronx District Attorney purportedly dismissing the charges that stemmed from the traffic stop; moreover, as stated in Footnote 2, of this Affidavit, the only mentioning of the Bronx District Attorney allegedly dismissing the charges from the Traffic Stop was the Stipulation entered into with the Prosecution by trial counsel, and the comments of the Judge during trial;

- 47. In response to the Nov. 8 Order, Mr. Green sent several Pro Se Submissions to the District Court; and, one of those was a Motion to Proceed "Pro Se";
- 48. Mr. Green also submitted, along with the Motion to Proceed Pro Se, a Motion for Extension of Time (hereafter "the First Request for Extension of Time") to comply with the Nov. 8 Order, directing the parties to brief the Court on whether now was an appropriate time for the Court to address Mr. Green's IAC and other post-conviction claims;
- 49. The First Request for Extension of Time also served as Notice of Mr. Green's Intent to File a Brief in response to the District Court's Nov. 8 Order; and, therein he also notified the District Court of his Intent "to brief the Court on ALL of his claims raised in his Sentencing [M]emorandum" (Emphasis In Original);
- 50. In the First Request for Extension of Time Mr. Green informed the Court that he needed more time to prepare his claims because: Mr.Green . ... is still waiting on more information to help him to be able to fully prepare his claims raised in his Sentencing Memorandum: Mr. Green sent letters to [Trial] Counsel requesting information needed to aid in his arguments at the evidentiary hearing; and[,] Ms. Dolan [even] requested some of these things at the [S]entencing [H]earing";
- 51. Mr. Green sent the First Request for Extension of Time, along with his Motion to Proceed Pro Se and other documents, to the District Court on or about November 22, 2019; however, Mr. Green did not see these pleadings uploaded to his Docket until he filed an Informal Complaint with the Clerk of Court (see Doc. No. 833) (re: Informal Complaint to the Clerk of Court) (Filed: January 8, 2020);
- 52. After Mr. Green filed this complaint, the District Court uploaded approximately twenty-six submissions of Mr. Green's that he had previously sent to the District Court (see Doc. No(s). 808-833) (all were uploaded on: 01/08/2020);
- 53. A large portion of those Docket filings mentioned above were Mr. Green's various Pro Se written submissions addressed to, inter alios, the Court's and Government, stating Mr. Green's desire to proceed forward with his post-conviction claims, and moreover, informing everyone that he is in need of relevant case information from, among others, Trial Counsel, before he can fully develop all of his claims and, consequently, that he needs more time and/or for the District Court to issue a Stay;
- 54. Approximately one-week later Mr. Green wrote a "Follow-Up Letter to the Court", dated, January 16, 2020 (see Doc. No. 837) (hereafter the "Jan. 16 Follow-Up Letter");

- 55. In the Jan. 16 Follow-Up Letter, Mr. Green reiterated his desire to the Judge to pursue his IAC and other claims; and he maintained that he needed additional time so that he can obtain and review information that he still had not received from, inter alia, his previous attorneys (i.e., Trial Counsels Client File);
- 56. Over the next couple of months Mr. Green continued to write the Judge to express his desire to address his post-conviction IAC and other claims, and to state that he needs more information from the Government and Trial Counsel, to enable him to be able to fully develop his claims (see Doc. No(s). 837, 838, and 848);
- 57. Ms. Dolan also continued to write the District Court, to inform the Judge of Mr. Green's desire to proceed with his claims, and to state that Mr. Green still needs documents and other information from the Government and Trial Counsel before he can finish preparing his IAC and other claims; furthermore, Ms. Dolan maintained her position to the Judge that a Faretta hearing was needed in order to allow Mr. Green an opportunity to present his claims on his own (See Doc. No. 852) (letter from Ms. Dolan to the Judge, re: Further Request for a Faretta Hearing)(Filed: February 26, 2020);
- 58. On March 2, 2020, approximately one week after Ms. Dolan's fourth written request for a Faretta Hearing, the Judge issued an Order (see Doc. No. 853) (hereafter the "March 2 Order"), which stated that: "a conference to discuss Defendant's desire to proceed pro se and Defendant's ineffective assistance of counsel claim will take place in this action on March 10, 2020, at 3:00 PM..." . Quoting, the March 2 Order;
- 59. The next day, on March 3, 2020, the a letter Mr. Green wrote to the Judge was docketed in his case (Doc. No. 854)(hereafter "March 3rd Letter"); this was a letter "Request[ing] ... [an] Order Compelling [Trial] Counsel To Provide Case Documents To Mr. Green". See the March 3rd Letter;
- 60. In the March 3rd Letter, Mr. Green maintained his desire to address his IAC and other claims, and that he needed documents from, inter alios, trial counsel in order to fully develop his arguments associated with those claims;
- 61. On March 9, 2020, approximately six (6) months after the initial Sentencing Hearing in this case, the Judge issued an Order continuing the conference that was scheduled to be held on March 10, 2020, to address Mr. Green's desire to pursue his IAC and other claims, as well as his desire to proceed Pro Se for the purpose of addressing those claims;

- 62. The Judge did this several more times over the next six month(s); every time the Court was supposed to address Mr. Green's desire to proceed pro se, the Court would continue the matter for a further date (See Doc. No(s). 858, 867, 871, 880, 883;
- 63. Around September of 2020, almost one year after Mr. Green submitted the Sentencing Memorandum, prompting the Judge to postpone the sentencing, Mr. Green sent several more Pro Se submissions to the District Court and the Government to continue to express his desire to address his IAC and other claims; and, maintaining that he needed more documents and other case information from the Government and Trial Counsel in order for him to be able to fully develop those claims (See Doc. No(s). 887, 890, 891, 893, 894, 895
- 64. The Judge never addressed any of these Pro Se submissions, and continued to adjourn the conferences that were scheduled to address Mr. Green's desire to pursue his IAC and other claims, and, his desire to proceed Pro Se for the purposes of doing so (See Doc. No. 901);
- 65. Eventually, the Judge finally held an electronic conference on November 17, 2020 (see Doc. No. 906) (hereafter the "Nov. 17 Order"); at which time the Judge granted Ms. Dolan's application to withdraw as Counsel, and granted Mr. Green Pro Se status with the appointment of Standby Counsel (See Id.);
- 66. At the Nov. 17 Faretta Hearing the Judge "directed [the Government] to arrange for the appointment of stand-by counsel." (See Docket Entry for Doc. No. 906) (Date Filed: Nov. 17, 2020);
- 67. The Judge also issued a Stay in the proceedings around this time, upon Mr. Green's request that one be given to him, because, among other issues, he still was without all the information that he needed to fully develop all meritorious post-conviction claims;
- 68. On November 19, 2020, two (2) days after the November 17 Faretta Hearing, the Judge issued a order (Doc. No. 907) (hereafter the "Nov. 19 Order");
- 69. In the Nov. 19 Order, the Judge discussed Mr. Green's claims regarding the violations of his rights that had and continued to take place, such as the violations of his rights to the effective assistance of counsel;
- 70. Regarding Mr. Green's claims that his attorneys had violated his rights, the Court stated, in the Nov. 19 Order, that Mr. Green began raising these concerns with the Court only a few months after his trial

had ended, and while the Judge had not yet ruled on Trial Counsels Rule(s) 29/33 Submissions. See Nov. 19 Order, Pg.(s) 1-2;

- 71. Moreover, the Judge decided that: "...it is more efficient to hear from [Mr.] Green's former lawyer's now concerning the issues he raises, while pretrial events and the trial itself are somewhat fresh in their minds". Quoting Nov. 19 Order, Pg. 7;
- 72. The Judge, in the Nov. 19 Order, then went on to state that:

"In order to proceed with [Mr.] Green's ineffective assistance of counsel claims, ... [Mr.] Green must execute the accompanying 'Attorney-Client Privilege Waiver (Informed Consent)' form. [Mr.] Green is also directed to set forth all of his allegations concerning Breslin, Geller, and Dolan's advice and conduct in the form of an Affidavit. Both the waiver form and the affidavit must be submitted to this Court no later than December 9, 2020."

Quoting Nov. 19 Order Pg. 8;

- 73. In November 23, 2020, four (4) days after the Nov. 19 Order, the Judge issued an Order (see Doc. No. 910), Ordering that the Conference in this matter that was scheduled for December 1, 2020, be adjourned to December 8, 2020 (See Docket Entry for Doc. No. 910) (Entered On: 11/23/2020);
- 74. A few weeks after the Judge issued the Nov. 19 Order, Mr. Green sent a letter to the Judge, dated December 4, 2020 (hereafter the "Dec. 4 Letter");
- 75. In the Dec. 4 Letter, which was titled, "Request for Additional Time to Submit Affidavit", Mr. Green informed the Judge that he still had not received the Judge's Nov. 19 Order and accompanying Attorney-Client Waiver Form;
- 76. Moreover, in the Dec. 4 Letter, Mr. Green updated the Judge on the status of the Affidavit of Facts supporting his claims against, inter alios, Trial Counsel; specifically, Mr. Green stated therein, that:
- "As it relates to the Affidavit, I'd like for this Court to be aware that the facts that I am required to submit therein span the course of several years (nearly 4 years), and deals with several attorneys who

have worked on this case. It has and will take some time for me to adequately research the facts to submit in this Affidavit."

Quoting the Dec. 4 Letter;

77. In the Dec. 4 Letter, Mr. Green went on to state:

"Therefore, in order to ensure that I am given an adequate opportunity to be heard, I respectfully request this Court provide me with additional time to complete and [s]ubmit the Affidavit and Attorney-Client Privilege Waiver form. Also, I'd like to point out to this Court that the Court recently issued me a STAY, and I'm not sure if this applies to the Affidavit[(s)] here. Clarification on this issue would be appreciated."

Quoting Id. (Emphasis in Original and Interpolation Added);

- 78. The Judge never answered Mr. Green's questions regarding the Stay [FN 4];
- 79. Mr. Green was not appointed stand-by counsel until almost one (1) month after the Court appointed him Pro Se status;
- 80. On December 8, 2020, the Court held a telephonic status Conference [FN 5] (hereafter the "Dec. 8 Conference"); at which time Mr. Green informed everyone that he was still in need of information from previous attorneys, and the Government;
- 81. At the Dec. 8 Conference, Mr. Green's new stand-by Counsel was assigned, the Attorney, Steven Witzel;
- 82. Not long after the Dec. 8 Conference, Mr. Green had a telephone conference with Mr. Witzel, and his assistants, Courtney Morphet, and Jennifer Coyler, at which time Mr. Witzel stated to Mr. Green that: "You know, Paul (referring to the Judge) is not too fond of you (referring to Mr. Green)";
- 83. Mr.Witzel and the Judge worked together in the Office of the United States Attorney, and they acknowledged knowing each other at the Dec. 8 Conference; moreover, the Judge either told this to Mr.

Witzel personally, or Mr. Witzel came to this conclusion on his own based upon his view of the facts and circumstances of this case;

- 84. On December 14, 2020, the Judge issued and entered an Order (Doc. No. 915) in this matter, adjourning the previously scheduled conference from December 22, 2020, to January 5, 2021;
- 85. On or about December 31, 2020, Mr. Green emailed Mr. Witzel to ask if how long it was going to take until trial counsel's client file for this case could be mailed to him; and, on January 2, 2021, Mr. Green sent another email to trial counsel, asking the same thing;
- 86. On January 5, 2021, Mr. Green had a telephonic Status Conference (hereafter the "Jan. 5 Status Conference") in this matter, at which time he apprised the Judge of, inter alia, the fact that he had STILL NOT RECEIVED THE Nov. 19 Order and the accompanying Waiver-Form;
- 87. When the Jan. 5 Status Conference began, the Judge told Mr. Green that if he did not sign and return the Wavier Form, that the Court would not hear is IAC claims prior to sentencing; that the Court would just instead proceed forward with sentencing him;
- 88. Mr. Green then tried to explain to the Judge that he still had not yet received the Waiver Form; and this was Confirmed by Mr. Witzel;
- 89. After Mr. Witzel says these things, Mr. Green continues to try and explain to the Judge that the Waiver Form was never sent to him, and the Judge threatens to "disconnect the" line if Mr. Green continues to speak:

MR. GREEN: ... nothing was ever sent to me. No waiver form, nothing.

THE COURT: Alright, if you continue doing this I'M GONNA END THE ... LINE, SO DON'T DO IT.... .

Transcript of Jan. 5 Status Conference (Emphasis Added);

90. Afterwards, Mr. Witzel informed the Judge that there was apparently issues with respect to getting documents Mr. Green, and explains that he'll work to ensure that Mr. Green receives the Waiver Form;

- 91. In response, and after a brief discussion with the Government about getting Mr. Green the Waiver Form, the Judge stated: "I mean I'm speechless about this because I issued the order on November 19th, that was a very long time ago, that was 6, 7 weeks ago. It's shocking to me that waiver form has not gotten to him in some fashion. Because ... we can't make any progress here on Mr. Green's IAC claims until we get a waiver. And everyone on the phone, OTHER THAN PERHAPS MR. GREEN understands that...." Quoting the Judge's Statements at the Jan. 5 Status Conference;
- 92. Mr. Witzel then goes on to say that he will be sure to send the Waiver Form to Mr. Green, and the Judge and Government both discuss making sure that Mr. Green gets this;
- 93. Afterwards, the Judge reiterates on the record that "by February 9, 2021" he wants "to hear from Mr. Green and his counsel whether the waiver form has been signed, and also the preparation of the affidavit that was discussed in" the Judge's "November 19 Order". See Id;
- 94. Mr. Green then goes on to again tell the Judge that he has no problem signing the Waiver Form, and that he still needs, inter alia, his client file from trial counsel so that he can adequately prepare his claims; moreover, he stated to the Judge that he felt as though he was being forced to address his IAC and other claims prematurely, without being first provided this information which he has been seeking for over a year;
- 95. Mr. Green continues to address the Court, and reiterates his position that it was his understanding that the purposes of these proceedings were to work to address the violations of his rights that took place throughout the course of his proceedings and trial, and he asked for the Court's assistance in addressing these claims;
- 96. Furthermore, while Mr. Green was in the process of addressing the Court, the Judge disconnected the line:

MR. GREEN: ... . All I'm asking for here is a fair chance to be heard and a fair chance to prepare my case and revaluate everything. I don't have a problem

MIKE (COURT CLERK): Mr. Green, let me just cut you in, the Judge just DISCONNECTED. We're just gonna have to go forward in February, SORRY.

CALL DISCONNECTED.

Quoting Id. (Emphasis Added).

97. In fact, Mr. Green was actually in the process of asking the Judge to be provided a right to be heard, when the Judge disconnected the line ending the Court Conference:

MR. GREEN: ... . All I'm asking for here is A FAIR CHANCE TO BE HEARD and a fair chance to prepare my case and reevaluate everything. I don't have a problem

MIKE (COURT CLERK): Mr. Green, let me just cut you in, THE JUDGE JUST DISCONNECTED. We're just gonna have to go forward in February, SORRY.

CALL DISCONNECTED.

Quoting Id. (Emphasis Added);

- 98. After the hearing, Mr. Green, obviously frustrated, emailed Mr. Witzel, and stated that he no longer wished to have him as stand-by counsel, that he wished to proceed from now on solely Pro Se, and that he objected to further electronic court appearances, in light of the Judge's disconnecting the line;
- 99. Mr. Green also wrote the Court, and informed the District Court, inter alia, that he "Objected" to further telephonic/electronic court appearances in this matter; that he wished to appear in person from now on, and, that he no longer desired to Mr. Witzel as stand-by Counsel;
- 100. Mr. Green did not receive the Waiver Form until on or about January 12, 2020, nearly one and one-half years after the Judge first stated at the October 31 Sentencing Hearing that such would be necessary here in order for the Court to proceed forward with addressing Mr. Green's IAC claims prior to sentencing;
- 101. Mr. Green was able to get the Waiver Form stamped on or about February 7, 2021, and in the mail on or about February 8, 2021, a full day before it was required;
- 102. Mr. Green still had not received trial counsels client file, and, among other prejudices suffered at MDC, the institution was "out of paper" for nearly a week and a half; therefore, Mr. Green submitted a Motion for Extension of Time (hereafter, "Mr. Green's Motion for Ext. of Time"), asking the Judge to

extend the time for him to submit, inter alia, his Affidavit of Facts supporting his post-conviction claims of, among other things, ineffective assistance of counsel;

- 103. Not long after this, the Judge ordered the Government to respond to Mr. Green's Motion for Ext. of Time;
- 104. On or about February 8, 2021 the Judge issued an Order (see Doc. No. 945) (hereafter the "Feb. 8 Order") misstating Mr. Green stating that: Defendant Brandon Green has informed the Court that he "refuses" to participate in any further proceedings by telephone (Jan. 6, 2021 Def. Ltr. (Dkt No. 932)). As a result of the COVID-19 pandemic, in-person operations at the courthouses in this District have been suspended, because such proceedings cannot be safely conducted... Given [Mr.] Green's "refusal" to participate by telephone, the conference in this matter previously scheduled for February 9, 2021, is adjourned sine die;
- 105. On or about this same day, Mr. Green sent the Judge written objections, to object and moreover clarify the Judge's misstatements in the Feb. 8 Order; Mr. Green stated in these written objections that he never said he "refused" to attend any further telephonic hearings, but instead was "formally objecting" to any such hearings in the future under the premises that his rights to, inter alia, due process are being violated at the telephonic hearing(s) by virtue of the Judge disconnecting the line while Mr. Green was speaking at the Jan. 5 telephonic Status Conference;
- 106. Mr. Green did not receive the Government's Letter Opposing his Motion for Extension of time until on or about February 12, 2021--two (2) days after the Judge issued its Order denying that request;
- 107. The Judge, on February 10, 2021, issued an Order (see Doc. No. 950) (hereafter the "Feb. 10 Order"), vacating it's Nov. 19 Order, stating that: "Because [Mr.] Green has not submitted an executed waiver form and has not submitted an affidavit detailing his ineffective assistance of counsel allegations against Breslin, Geller, and Dolan, this Court will not consider his ineffective assistance of counsel claims prior to sentence." Quoting the Feb. 10 Order, Pg. 4;
- 108. Mr. Green, however, did submit the Waiver Form on time, contrary to the Judge's statements in the Feb. 10 Order; this was uploaded to Mr. Green's Docket on or about February 12, 2021; moreover, Mr. Green avers that he did not submit his Affidavit of Facts therewith the Waiver Form that day because of, among other issues brought to the Judge's attention by Mr. Green, there was "no paper" for the printers at the Institution (referring to MDC), and the Institution has not sold any ribbons for the Type-Writers for "over six (6) months" due to vendor issues as a result of the Coronavirus Pandemic;

- 109. Mr. Green, as a result of the Judge's Feb. 10 Order, coupled with his previous acts of bias / prejudice e.g., inter alia, disconnecting the telephonic conference on Mr. Green while he was speaking Mr. Green has chosen to move to recuse the Judge, so that he can have a fair right to be heard on, among other issues in this Case, his accompanying Motion for Reconsideration of the Feb. 10 Order;
- 110. Moreover, because Mr. Green needs to seek reconsideration of the Judge's Order, and because a reasonable person faced with all the relevant facts of this Case would feel as though the Judge would not rule fairly on that Order, the Judge is required to Recuse himself upon the filing of this Affidavit and the accompanying papers;
- 111. Therefore, Mr. Green is filing this Affidavit [FN 6], asking the Judge to Recuse himself, and allow the appointment of another Judge to this case to rule on the Reconsideration, and any and all other issues that need to be addressed in this case from here-on-out;
- 112. To give credence to Mr. Green's claims herein, and in the accompanying papers, that he does not feel as though he can receive a fair hearing in front of the Judge, and, that there are a lot of issues in this case that warrant a new trial, Mr. Green has submitted Petitions On the Internet asking for signatures of individuals who support these requests; Specifically, the Petition asking for Signature from supporters of Mr. Green's request for a "different judge", which has only been active for a couple of days, already has a little over two-hundred (200) signatures, see Exhibit "\_\_", and the list continues to grow; and, as it relates to Mr. Green's online Petition asking for signatures of those who support his request for a "new trial", which has been up for several months, has over one-thousand (1,000) signatures, and counting. See Exhibit "\_\_";
- 113. Mr. Green submits that the information contained herein consists of the Relevant Facts needed by the Judge when considering his requests herein that the Judge recuse himself; and, these same facts support the accompanying "Motion to Recuse", which Mr. Green requests the Judge rule upon based on this information that he's submitted herein;
- 114. Lastly, Mr. Green certifies that the facts and information herein and in the accompanying papers are all submitted in good faith; and, moreover, have not been filed for the purposes of undue harassment or delay in these proceedings, but instead is being submitted to ensure that Mr. Green's receives Justice at the hands of an impartial Judiciary [FN 7];
- 115. Mr. Green submits that because he's Pro Se, but has stand-by Counsel, the Good Faith Certificate required by Sec. 144 to be made by counsel on the record for the case should be made by stand-by Counsel, the Attorney, Steven Witzel; therefore, Mr. Green sent Mr. Witzel copies of this Affidavit and

the accompanying papers, along with a request that he submit therewith - on Mr. Green's behalf - the required Certificate of good faith;

- 116. However, Mr. Green submits that if stand-by Counsel, for whatever reason refuses to do so, then this Court should proceed forward with determining his request for recusal, either under that or the other Statutes used by Mr. Green therein;
- 117. The Waiver Form was uploaded to Mr. Green's docket on February 16, 2021, approximately nine (9) days after Mr. Green mailed it to the Court from the Institution;
- 118. On or about February 23, 2021, Mr. Green received Mr. Breslin's Letter to the Judge, which supports Mr. Green's contentions that, inter alia, he still is without his client file from trial counsel; and, this letter also raises serious concerns regarding the underlying fairness of these proceedings: Why was Ms. Dolan never provided with a working copy of Mr. Green's client file, Why did she never say anything to anyone, especially Mr. Green, and, why nearly two (2) years after his conviction is Mr. Green still without this information!

EXECUTED and SWORN TO On this 23rd day of February 2021.

tespectfully Submitted,
/\$/
Brandon Green Reg. # 56400-054
Defendant, Pro Se
SWORN DECLARATION
I, Brandon Green, Under the Penalty of Perjury, do hereby swear that I've read the information contained in the foregoing Affidavit, and that it is true and correct. 28 U.S.C. Section 1746. On this 23rd day of February 2021.
Signature:/S/
Print: Brandon Green
FOOTNOTE(S)

# FOOT Notes

- 1. Because the issues surrounding the Motion to Recuse and Motion to Reconsider are directly related, Mr. Green felt it would be easier if he used the same Affidavit for both these pleadings.
- 2. The "accompanying papers" are: The "Cover-Letter" and "Notice of Intent", the "Motion to Recuse", and the "Motion for Reconsideration" and "Supporting Memorandum". Furthermore, Mr. Green asks that all these documents be read and considered together when determining the appropriate relief to grant here.
- 3. The Traffic Stop played a huge role in Mr. Green's trial and subsequent conviction(s): It allowed the Prosecution to introduce the only alleged evidence of actual drugs, purportedly some cocaine, that the arresting officer from the traffic stop testified to allegedly finding on Mr. Green during the stop; and, the Court even relied on this evidence in its Memorandum Opinion & Order. See United States v. Johnson, et al., 2019 U.S. Dist. LEXIS 160088 (decided September 16, 2019). Trial Counsel stipulated to the traffic stop being dismissed by the Bronx District Attorney, See Trial Transcript Pg. 2884; however, the actual disposition reflects that the state court Judge, the Honorable Greenberg E., dismissed all pending criminal charges related to the Traffic Stop. The only other mention of the Bronx D.A. dismissing this case was the Judges statement(s) at trial:

THE COURT: I guess I'm under the impression the DA's office dismisses all the time in cases where it concludes that there might be a search issue... .

Trial Transcript Pg. 25 LL 22-24. Moreover, even if the Bronx D.A. did dismiss it, then according to the Judge, that would support Mr. Green's contentions here and to trial counsel that there was in fact "search issues" in that case. Nevertheless, when Mr. Green informed trial counsel of this, trial counsel should have moved the Court to exclude/suppress the alleged evidence associated with the traffic stop. See Elkins v. United States, 80 S. Ct. 1437, 4 L. Ed. 2d 1669, 364 US 206 (1960) (In determining, for the purpose of its admissibility in a federal criminal trial, whether evidence has been obtained in an unreasonable search and seizure by state officers, a federal court MUST make an INDEPENDENT INQUIRY, WHETHER OR NOT there has been such an inquiry by a state court, and IRRESPECTIVE of how such inquiry may have turned out). (Emphasis Added). There was never any such inquiry held by the District Court in this Case.

4. Nearly two years ago, after trial, while trial counsel was still on this Case, Mr. Green sent an email to trial counsel asking trial counsel to move the Court for a Stay so that he can address all of his concerns. In response to this email, trial counsel responded by stating: "There is no such thing as a stay", see Exhibit "A"; then, trial counsel later responded by stating: "No one is giving you a stay". See Exhibit "B".

- 5. As everyone reading this is aware, electronic / telephonic court appearances have become the norm since the Coronavirus Pandemic began over a year ago.
- 6. 28 U.S.C. Section 144 requires an affidavit that the judge before whom the matter is pending has a personal bias or prejudice against him or in favor of any adverse party. See Livecchi v. Gordon, 544 B.R. 57, 2015 U.S. Dist. LEXIS 158040.
- 7. 28 U.S.C. Section 144 also requires a certificate of good faith from counsel on the record. 28 U.S.C. Sec. 144. For more on how this applies to Mr. Green's Case, please refer to the accompanying Motion to Recuse.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT of NEW YORK
X
UNITED STATES OF AMERICA,
Plaintiff,
- against -
BRANDON GREEN, et al.,
Defendant, Pro Se.
X
Case No. 16 Cr. 281002 (PGG)

### MOTION TO RECUSE

### I. Introduction

"Give sentence with me, O God, and defend my cause against the ungodly people:

O deliver me from the deceitful and wicked man."

- Prayer Book 1662

The defendant, Brandon Green, Pro Se [FN 1], hereby respectfully submits this Motion to Recuse, under Title 28 U.S.C. Section(s) 144, 455(a), 455(b)(1), and U.S. Code Jud. Conduct, Canons 1, 2(A), and 3 et seq., to humbly ask the Judge whom this case is currently before, the Honorable United States District Court Judge, Paul G. Gardephe (hereafter "the Judge"), to recuse himself because, inter

alia, the existence of personal bias and prejudice harbored by the Judge against Mr. Green. The facts and relevant information supporting this Motion are contained in the Accompanying Affidavit [FN 2], and reiterated and further argued herein. Mr. Green submits the following information in support this Motion:

### II. Conclusion

The Judge should recuse himself and allow for the appointment of another Judge.

#### III. Some Relevant Law

Motions to Recuse; Generally; Title 28 U.S.C. Section(s) 144, 455(a)

Section 455(a) provides that "[a]ny justice, judge, or magistrate of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned." 28 U.S.C. Section 455(a). Section 144 provides for disqualification where a party "files a timely affidavit" that includes "the facts and reasons" for the party's belief "that the judge before whom the matter is pending has a personal bias or prejudice against him or in favor of any adverse party." Id. Section 144.

- ~ Code of Conduct for United States Judges; Disqualification
- (C) Disqualification
- (1) A judge shall disqualify himself ... in a proceeding in which the judge's impartiality might reasonably be questioned, including but not limited to instances in which:
- (a) the judge has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;
  - Code of Conduct for United States Judges; Disqualification; Remittal of Disqualification

The Code of Conduct for the United States Judges, Title 28 U.S.C., goes on to state, regarding disqualification of judges, that:

## (D) Remittal of Disqualification

Instead of withdrawing from the proceeding, a judge disqualified by Canon 3C(1) may, except in circumstances specifically set out in subsection (a) through (e), disclose on the record the basis of disqualification. The judge may participate in the proceeding if, after that disclosure, the parties and their lawyers have an opportunity to confer outside the presence of the judge, all agree in writing or on the record that the judge should not be disqualified, and the judge is then willing to participate. The agreement should be incorporated in the record of the proceeding. Code of Conduct for United States Judges, Canon 3(D).

~ Code of Conduct for United States Judges; Integrity of Judiciary; Canon 1

Canon 1, of the Code of Conduct for United States Judges. states:

A Judge Should Uphold the Integrity and Independence of the Judiciary

An independent and honorable judiciary is indispensable to justice in our society. A judge shall maintain and enforce high standards of conduct and should personally observe those standards, so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective.

Code of Conduct for United States Judges; Appearance of Impropriety; Canon 2

Canon 2, of the Code of Conduct for United States Judges states, in pertinent part, that:

A Judge Should Avoid Impropriety and the Appearance of Impropriety in All Activities

(A) Respect for Law. A judge should respect and comply with the law and should act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.

∼ Code of Conduct for United States Judges; Appearance of Impropriety; Canon 2; Commentary

Canon 2A. An appearance of impropriety occurs when reasonable minds, with knowledge of all the relevant circumstances disclosed by a reasonable inquiry, would conclude that the judge's honesty, impartiality, temperament, or fitness to serve as a judge is impaired. Public confidence in the judiciary is eroded by IRRESPONSIBLE or IMPROPER conduct by judges, including harassment and other inappropriate workplace behavior. A judge must avoid all impropriety and appearance of impropriety. This prohibition apples to both professional and personal conduct. A judge must expect to be the subject of constant public scrutiny and accept freely and willingly restrictions that might be viewed as burdensome by the ordinary citizen. Because it is not practical to list all prohibited acts, the prohibition is necessarily cast in the general terms that extend to the conduct by judges that is harmful although not specifically mentioned in the Code. Actual improprieties under this section include violations of the law, or other provisions of this Code.

Code of Conduct for United States Judges; Duties of Office; Duty to Act Fairly, Impartially, and Diligently; Canon 3

Canon 3, of the Code of Conduct for United States Judges, discusses the duties of office imposed upon a judge. Specifically, Canon 3 states, inter alia, that:

A Judge Should Perform the Duties of Office Fairly, Impartially, and Diligently

The duties of judicial office take precedence over all other activities. The judge should perform those duties with respect for others, and should not engage in behavior that is harassing, abusive, prejudiced, or biased. The judge should adhere to the following standards:

- (A) Adjudicative Responsibilities.
- (1) A judge should be faithful to and maintain professional competence in the law, and should not be swayed by partisan interests, public clamor, or fear of criticism.
- (2) A judge should hear and decide matters assigned, unless disqualified, and should maintain order and decorum in all judicial proceedings.

- (3) A judge should be patient, dignified, respectful, and courteous to litigants, jurors, witnesses, lawyers, and others with whom the judge deals in an official capacity, and should require similar conduct by those subject to the judge's control, including lawyers to the extent consistent with their role in the adversary process.
- (4) A judge should accord to every person who has a legal interest in a proceeding, and that person's lawyer, the full right to be heard according to law....\
  - ~ Motions to Recuse; Section 144; Certificate of Good Faith
- 28 U.S.C. Section 144, states, regarding affidavits for recusal filed under this Section, that such affidavit: "[S]hall be accompanied by a certificate of counsel of record stating that it is made in good faith."
  - Motion to Recuse; Section 144; Certificate of Good Faith; Pro Se Litigants

Even if pro se litigant is unable to comply with the Certificate of Good Faith requirement of 28 U.S.C. Section 144, a court still should address the merits of the defendant's affidavit. See the Sea Gate Association v. Krichevsky, 2019 U.S. Dist. LEXIS 230494 (2019).

- IV. Argument In Support of Recusal
  - A. Relevant Facts & Background Information
- Mr. Green submits that the facts and background information in support of this Motion are contained in the accompanying "Supporting Affidavit"; and, he fully adopts and incorporates by reference herein the information within that Affidavit.
  - B. The Decision to Recuse

Mr. Green submits decided to move for recusal after he received and reviewed the Judge's Feb. 10 Order (Doc. No. 950) (hereafter the "Feb. 10 Order"), which denied Mr. Green's Motion For Extension of Time, and moreover, vacated the Judge's earlier Order from November 19, 2020 (Doc. No. 907) (hereafter the "Nov. 19 Order"). Moreover, in the Feb. 10 Order, the Judge stated that he would "no longer" hear Mr. Green's ineffective assistance of counsel (IAC) claims prior to sentencing. This, however, was not the only reason supporting Mr. Green's request for recusal. Cf. Liteky v. United States, 510 U.S. 540, 555, 114 S. Ct. 1147, 127 L. Ed. 2d 474 (1994)("[J]udicial rulings alone almost never constitute a valid basis for a bias or partiality motion... . Almost invariably they are proper grounds for appeal, not recusal."). The Judge's conduct and behavior towards Mr. Green prior to this also played a huge role in his decision to recuse.

Mr. Green submits that only about two month(s) prior to the Judge issuing the Feb. 10 Order, stand-by Counsel, the Attorney, Steven Witzel, whom worked with the Judge several years back, in the U.S. Attorney's Office, told Mr. Green that: "You know, Paul (the Judge) is not too fond of you (Mr. Green)". This statement was said by Mr. Witzel to Mr. Green while they were on a tele-conference with Mr. Witzel's assistants. See Affidavit of Facts in Support of Motion to Recuse, Pg. 11. Then, approximately one (1) month after this, the Judge disconnected the line during a telephonic court conference while Mr. Green was in the process of speaking (exercising his due process right to be heard). See Id. at 12-13. Moreover, Mr. Green submits that he was not too surprised to learn that the Judge was not fond of him, because it has been pretty apparent from the judges tone, demeanor, and moreover, by his attempts to discourage Mr. Green in his attempts to rectify the violations of his rights that occurred in this Case.

Furthermore, Mr. Green submits that the Court's Feb.10 Order, and moreover, the Judge's decision to deny Mr. Green's Motion for Extension of Time, manifests the bias and prejudice harbored by the Judge against Mr. Green; and, it was a clear abuse of discretion. Mr. Green will show later herein that, considering the facts, the Judge should not have denied his request for an extension of time, and moreover, should not have refused to hear his ineffective assistance of counsel claims prior to sentencing. Mr. Green now needs to seek a reconsideration of the Feb. 10 Order to prevent a manifest injustice, and there is a Local Criminal Procedure Rule that allows this, Local Rule 49.1(d) (allowing for the filing of reconsiderations in criminal cases). This is what Mr. Green now must do with regards to the Feb. 10 Order, however, he does not feel as though the Judge will rule on this reconsideration fairly: Mr. Green submits that the Judge's past conduct, behavior, and decisions, coupled with his apparent bias and prejudice against him, has caused him to no longer fell as though he can receive a fair hearing in front of him. Therefore, Mr. Green is seeking to Recuse the Judge so that he can get a fair and impartial ruling on his Motion for Reconsideration of the Judge's Feb. 10 Order. Thankfully, Mr. Green submits that there are plenty of avenues available for him to do this; and, he'll be discussing these options more herein throughout this Motion.

C. Grounds Supporting Recusal

~ A Brief Discussion

There are several options available to Mr. Green regarding seeking to recuse the Judge. Below, Mr. Green will list these options as well as the particular facts and circumstances of his Case that support the avenues of relief. Furthermore, Mr. Green asks the Judge to please review these Grounds and pick any one or several to support the relief sought herein.

# (i) 28 U.S.C. Section 455(a)

28 U.S.C. Section 455(a) states: "Any justice, judge, . . . of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned." Quoting Id. Black's Law Dictionary, defines "impartial" as: "Not favoring one side more than another; unbiased and disinterested; unswayed by personal interest." Quoting Black's Law Dictionary (5th Pocket Ed.).

# (ii) 28 U.S.C. Code of Conduct for United States Judges; Canon 2

Canon 2, of the U.S. Code Jud. Conduct states: A Judge Should Avoid the Appearance of Impropriety in All Activities; and, Section "(A)", Respect for Law, states: "A judge should respect and comply with the law and should act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary." Quoting and Paraphrasing U.S. Code Jud. Conduct, Canon 2, 2(A).

# (iii) 28 U.S.C. Section 455(b)(1)

28 U.S.C. Section 455(b)(1), states that disqualification of any justice or judge in the United States is required: "Where he has a personal bias or prejudice concerning a party...." Quoting Id.

# (iv) 28 U.S.C. Section 144

28 U.S.C. Section 144 provides for the disqualification of a federal judge upon a party's filing of a timely and sufficient affidavit that the judge has a personal bias or prejudice. Paraphrasing Id.

# (v) 28 U.S.C. Code of Conduct for United States Judges; Canon 3

Canon 3, U.S. Code Jud. Conduct, states: A Judge Should Perform the Duties of Office Fairly, Impartially, and Diligently. Canon 3 goes on to state: "The duties of judicial office take precedence over all other activities. The judge should perform those duties with respect for others, and should not engage in behavior that is harassing, prejudiced, or biased...." Quoting Id.

# D. Argument and Analysis

Mr. Green contends that he decided to move to recuse the Judge on or about February 12, 2021, when he received - in the mail - and reviewed the Judge's Feb. 10 Order, denying his Motion for Extension of Time, and vacating the Nov. 19 Order, thereby refusing to hear Mr. Green's ineffective assistance of counsel (IAC) claims prior to sentencing. See Accompanying Affidavit, Pg. 14. However, as stated above, the Feb. 10 Order was not the only reason behind Mr. Green's decision to seek to recuse the Judge. As stated by the United States Supreme Court in Liteky, supra: "judicial rulings alone almost never constitute a valid basis for a bias or partiality recusal motion... Apart from surrounding comments or accompanying opinion, they cannot possibly show reliance on an extrajudicial source; and, absent such reliance, they require recusal only when they evidence such deep-seated favoritism or antagonism as would make fair judgment impossible." Quoting Liteky, supra (Internal Citations Omitted).

Here, in addition to the Judge's Feb. 10 Order, which was completely arbitrary, Mr. Green submits that he also has for evidence to support this Motion the statement made to him by stand-by Counsel, Mr. Witzel, see Accompanying Affidavit, Pg. 11, and, the fact that the Judge threatened to disconnect, and then actually did disconnect the line - during a telephonic / electronic Status Conference in this matter - while Mr. Green was exercising his right to be heard. See Id. Pg.(s) 12-13. These are exactly the types of surrounding comments and factors that the Supreme Court was referring to in Liteky: i.e., the comment from Mr. Witzel to Mr. Green, stating that the Judge is not too fond of him, and the Judge's threatening to disconnect, and his actually disconnecting the line during a Status Conference in this matter. These comments, and this behavior by the Judge evince that the Judge's arbitrary denial of Mr. Green's Motion for an Extension of Time, and refusal to hear Mr. Green's IAC claims prior to sentencing, was the result of the bias and prejudice harbored by the Judge against Mr. Green.

Mr. Green submits that - as this Court is aware - he has been raising issues regarding the effectiveness of his attorneys representation since his trial ended nearly two (2) years ago, see Accompanying Affidavit; and, he has been trying that entire time to get information from, inter alios, Accompanying Affidavit; and, he has been trying that entire time to get information from, inter alios, Trial Counsel, so that he can be provided with a meaningful opportunity to be heard with respect to his post-conviction claims of, inter alia, IAC. See Id. For nearly two (2) years, Mr. Green has been asking the Judge for more time to submit his "Affidavit of Facts" in support of his IAC and other claims, so that he can first receive and review Trial Counsels Client File. [FN 3] In spite of several requests, complaints, and notices of intent to sue and file complaints with, inter alios, the American Bar Association, Trial Counsel never provided Mr. Green with the Client File. [FN 4] See Id. Pg.(s). 8-13.

Prior to the Judge issuing the Feb. 10 Order, Mr. Green had informed the Judge, in several written submissions, that he needed to be provided additional time to submit, inter alia, his Affidavit of Facts in Support of his IAC claims, and, the Attorney-Client Waiver Form (hereafter "the Waiver Form"); and that he still had "not" received the Judge's Nov. 19 Order, and accompanying Waiver Form, and that he still has not received his Client File, among other information needed to address his IAC and other post-conviction claims. See Id. One of these Letters by Mr. Green was dated December 4, 2020--which was the same day Mr. Green sent it to the Judge. For some reason, however, the Judge, during status conference(s) held in this matter, seemed to be insinuating that Mr. Green was "refusing" to sign the Waiver Form, and, when Mr. Green tried to clarify that he was not refusing, and simply just did not have the Waiver Form or the Judge's Nov. 19 Order, the Judge reacted angrily, and with hostility, threatened to disconnect the telephonic / electronic conference.

These were not the only factors justifying Mr. Green's requests to the Judge for additional time to submit the Waiver Form and Affidavit of Facts supporting his IAC claims. In addition to informing the Judge that he still had not received the Judge's Nov. 19 Order, and the accompanying Waiver Form, Mr. Green also informed the Judge of the prejudices suffered by him due to the restrictions at the Institution - the Metropolitan Detention Center (MDC) - imposed upon him because of the Global Coronavirus - the Metropolitan Detention Center (MDC) - imposed upon him because of the Global Coronavirus - the Metropolitan Detention Center (MDC) - imposed upon him because of the Global Coronavirus - the Institution remains on lockdown, and, he also told the Judge that MDC had ran out paper for the printer--therefore, he could not print off, among other legal documents, his Affidavit of Facts in support of his IAC claims. See Accompanying Affidavit.

Furthermore, Mr. Green did not get the Nov. 19 Order until on or about, January 12, 2021, nearly one (1) and a half (1/2) years from the time the Judge first stated that such would likely be required here in order to hear Mr. Green's IAC claims. See Accompanying Affidavit Pg. 6 (the Judge stated at the October 31, 2019 sentencing hearing that Mr. Green would be required to waive the Attorney-Client Privilege in order to proceed with his ineffective assistance claims, and that this would have to be in writing). [FN 5] Mr. Green was unable to get the Waiver Form notarized because of institutional policy. Mr. Green later was able to get a staff member who is authorized to administer oaths, under the United States Code, to stamp the Waiver Form, and the next day, on February 8, 2021, Mr. Green timely filed the Waiver Form via the Prison Mailbox Rule when he handed it in to MDC Staff for delivery, via U.S. Legal Mail, to the United States Courthouse, for the Southern District of New York. [FN 6] However, approximately two (2) days later the Judge, without waiting to see if Mr. Green actually timely submitted the Waiver Form, issued and entered the Feb. 10 Order, deciding to no longer hear Mr. Green's IAC claims prior to sentencing because, the Judge claimed that: "The completed informed consent form was not returned to the Court, and [Mr.] Green did not submit an affidavit concerning his ineffective assistance of counsel claims." Quoting Feb. 10 Order. However, this is not entirely true, and the Judge should not have issued this Order considering this, and because Mr. Green clearly showed good cause in his requests for an extension of time to do these things.

Mr. Green now desires to utilize the Local Criminal Procedural Rule, Rule 49.1(d), to get the District Court to reconsider the Feb. 10 Order, however, because the Judge is and has displayed bias and prejudice against him, he does not feel that he will receive a fair hearing; therefore, he has decided to seek to recuse the Judge, using the applicable Statutes listed herein. Moreover, Mr. Green argues that the Judge should recuse himself here because "a reasonable person, knowing all the facts would conclude that the court's impartiality might reasonably be questioned", Quoting Collins, infra (Internal

Citations and Quotations Omitted); and, also because "an objective, disinterested observer fully informed of the facts underlying the grounds on which [the] recusal was sought would entertain significant doubt that justice would be done" in this Case. Quoting Collins, infra.

Mr. Green also submits that the Judge should be recused for violating, among other rights, his right to be heard, when the Judge disconnected the line during the Jan. 5 telephonic / electronic Status Conference. This was highly unconstitutional, unethical, and is not indicative of the type of behavior that is expected and moreover required of an appointed official tasked with the administration of justice. See U.S. Code Jud. Conduct, Canon 1:

A Judge Should Uphold the Integrity and Independence of the Judiciary

An independent and honorable judiciary is indispensable to justice in our society. A judge should maintain and enforce high standards of conduct and should personally observe those standards, so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective.

- U.S. Code Jud. Conduct, Canon 1. Moreover, when the Judge threatened to and then subsequently disconnected the line at the Jan. 5 Status Conference, the Judge was not acting in accord with this and other Judicial Canons. This was unacceptable behavior and was a severe violation of Mr. Green's rights.
- U.S. Code Jud. Conduct, Canon 3, section "(A)" discussing "Adjudicative Responsibilities" of the Judge, states:
- (1) A judge should be faithful to and maintain professional competence in the law, and should not be swayed by partisan interests, public clamor, or fear of criticism.
- (2) A judge should hear and decide matters assigned, unless disqualified, and should maintain order and decorum in all judicial proceedings.
- (3) A judge should be patient, dignified, respectful, and courteous to litigants, jurors, witnesses, lawyers, and others with whom the judge deals in an official capacity... .
- (4) A judge should accord to every person who has a legal interest in the proceeding, and that person's lawyer, the FULL RIGHT TO BE HEARD ACCORDING TO LAW....

U.S. Code Jud. Conduct, Canon 3(A) (Emphasis Added). The Judge did not afford Mr. Green the "full right to be heard according to law" at the Jan. 5 Status Conference, and therefore, he should now be recused from this Case.

# E. The Online Petition

As stated in the Accompanying Affidavit, Mr. Green currently has two (2) Petitions on the internet, one of them asking for signatures of individuals supporting Mr. Green's desire for a new trial, and the other asking for signatures of supporters of Mr. Green's request for a new judge. With respect to the latter, Mr. Green submits that despite the Petition only being active for a couple of days [FN 7], the currently has over two-hundred (200) signatures, see Exhibit "C", of individuals who support his request for a new judge [FN 8]; and, the Petition seeking supporters of Mr. Green's request for a new trial, which has been up for significantly longer, has over one-thousand (1,000) signatures. See Exhibit "D". These people all agree with Mr. Green that a new trial, and moreover a new judge, is needed for justice to be done here. Accordingly, the Judge should recuse himself, and allow for the appointment of another judge to rule upon, among other things, the accompanying papers.

## V. Relief Sought

WHEREFORE the Defendant, Brandon Green, RESPECTFULLY moves the Honorable District Court Judge, Paul G. Gardephe, to recuse himself from this Case, and allow for the appointment of another Judge to take over the Case, and hear Mr. Green's accompanying Motion to Reconsider; and/or, in the alternative, Mr. Green submits that disqualification here can be remitted in the event all parties are able to come to a meeting of the minds here.

EXECUTED On this 23 day of February, 2021.

Respectfully Submitted,

\_\_\_\_\_/S/\_\_\_\_

Brandon Green Reg. # 56400-054

Defendant, Pro Se

#### FOOTNOTE(S)

- 1. Mr. Green asks that this Court please liberally construe this Pro Se submission. See Erickson v. Pardus, 551 U.S. 89, 84, S. Ct. 2197, 167 L. Ed. 2d 1081 (2007); and see, Harris v. Mills, 572 F. 3d 66, 72 (2d Cir. 2009) (both cases showing that both the United States Supreme Court and Second Circuit require that the Court liberally construe pro se pleadings).
- 2. Sent herewith is an "Affidavit of Facts" in support this Motion (hereafter the "Accompanying Affidavit"); which is also submitted as, inter alia, an affidavit for recusal, under 28 U.S.C. Sec. 144. Moreover, although the Accompanying Affidavit is legally enough itself to warrant recusal, Mr. Green has additionally gone ahead and prepared this Motion, to further explore, and discuss the relevant law and facts here.
- 3. Mr. Green did not discover, until he had the Court relieve Ms. Dolan from this Case, that the client file that trial counsel sent to Ms. Dolan did not work, contained a virus, and/or otherwise contained no readable data. Moreover, in a recent letter dated, February 16, 2021, Mr. Breslin wrote this Court stating, inter alia, that: "Ms. Dolan NEVER advised that she could not access the documents." Quoting Mr. Breslin's Letter to this Court, dated February 16, 2021 (hereafter "Mr. Breslin's Feb. 16 Letter") (Emphasis Added).
- 4. Recently, stand-by Counsel informed Mr. Green that Mr. Breslin recently sent a letter to this Court, giving Notice that he would be providing Mr. Green with the client file.
- 5. Mr. Green submits that what the Judge said here might not be completely accurate. See Rudaj v. United States, 2011 U.S. Dist. LEXIS 67745 (S.D.N.Y. 2005) (therein the Court mentioned an American Bar Association (ABA) opinion that the Government had cited in that case, which stood for the proposition that when a defendant raises issues of ineffective assistance, he in effect waives any privileged communications associated with that claim; and, the Government argued that therefore, the defendant did not have to sign a waiver and the attorney could ethically respond if the court so ordered. See ABA, Standing Committee on Ethics and Professional Responsibility, Formal Opinion 10-456, July 14, 2010 at Standing Committee could have just ordered Mr. Green's previous attorneys to respond to his Claim, 1). Therefore, the Judge could have just ordered Mr. Green's previous attorneys to respond to his Claim, especially being that Mr. Green unequivocally expressed to the Court his desire to pursue his ineffective assistance of counsel claims, and that he was willing to waive the attorney-client privilege.

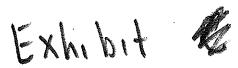
- 6. Under the prison mailbox rule a pro se prisoner's complaint is deemed filed upon its delivery to prison authorities for transmittal to the district court. Sides v. Paolano, et al., 782 Fed. Appx. 49, 2019 U.S. App. LEXIS 31358 (2d Cir. 2019).
- 7. The online petition seeking signatures for supporters of a new trial had already been activated online by Mr. Green's loved ones for several months when Mr. Green decided to also do one for the new judge--which decision he did not make until a few days after he decided to move the Judge to recuse himself.
- 8. Mr. Green submits that on the online petition asking for signatures of supporters of his request for a new Judge, there is a link that allows the individual to listen to the Jan. 5 Status conference in this case, and they hear the Judge disconnecting on Mr. Green, a Pro Se litigant, as he's exercising his right to be heard. Moreover, the same individuals who signed Mr. Green's Online Petition for a new judge listened to this before signing, therefore, Mr. Green argues that these signatures of over two hundred (200) individuals, meets the substantive standard recusal requirement. See United States v. Collins, 2005 U.S. Dist. LEXIS 40305 (S.D.N.Y. July 20, 2005): The substantive standard of recusal [under Sections 144 and 455(b)(1)] is whether a reasonable person, knowing all the facts, would conclude that the court's impartiality might reasonably be questioned. The standard under Section 455(a) is whether an objective, disinterested observer fully informed of the facts underlying the grounds on which recusal was sought would entertain significant doubt that justice would be done in the case. Paraphrasing Collins, supra (Internal Citations and Quotations Omitted). Therefore, the Judge should recuse himself from this case. Nevertheless, even if these online signatures do not meet the substantive standard for recusal, they give credence to Mr. Green's claims that there are serious problems in this case, and a new judge and new trial are necessary to ensure that justice is done here. These individuals are not the only disinterested individuals to comment about there being serious issues in this case; for instance, Attorney Isaac Wright, whose also running for mayor of New York, commented about this case recently, by stating: "It appears to me that your claims of ineffective assistance of counsel will require an evidentiary hearing"; and, that "[y]our case has a torrid procedural history[,] and it is clear to me that you were not treated within the bounds of the proper lawful administration of justice."

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
X
UNITED STATES DISTRICT COURT,
Plaintiff,
- against -
BRANDON GREEN, et al. ,
Defendant, Pro Se.
X
202 (002 (005))
Case No. 16 Cr. 281002 (PGG)

### INDEX TO EXHIBITS

EXHIBIT	DESCRIPTION
"A"	Email from Mr. Breslin to Mr. Green dated: 06/25/2019
"B"	Email from Mr. Breslin to Mr. Green dated: 07/17/2019
"C"	Online Petition for New Judge
"D"	Online Petition for New Trial

Respectfully Submitted,	
/\$/	
Brandon Green Reg. # 56400-0	)54
Defendant, Pro Se	



### Cismowski, Diane

Subject: Attachments: FW: United States v. Johnson

50-H transcript (2).PDF; 50-H TRANSCRIPT.PDF; Certificate of Disposition.PDF; defendant transcript-jeffrey sisco.PDF; MCC Hospital records - complete copy.PDF; MCC Hospital.PDF; NOC scan.PDF; plaintiff transcript.PDF; RESPONSE TO PREMILINARY CONFERENCE ORDER-BRANDON.PDF

From: Geller, Melissa S. < MSGeller@duanemorris.com>

Sent: Friday, January 25, 2019 11:17 AM

To: Feinstein, Jessica (USANYS) < <a href="mailto:lessica.Feinstein@usdoj.gov">! Nichols, Allison (USANYS) < <a href="mailto:Allison.Nichols@usdoj.gov">Allison.Nichols@usdoj.gov</a>);

Chan, Andrew (USANYS) < Andrew Chan@usdoj.gov >

Cc: Breslin, Eric R. < ERBreslin@duanemorris.com >; Paula Mazurek < paulanotari@aol.com >; Ezra Spilke

<ezra@spilkelaw.com>; Murray Trial@hotmail.com

Subject: United States v. Johnson

Jessica, Allison, and Andrew,

We obtained the attached records yesterday evening. We are disclosing them in accordance with our reciprocal discovery obligations. If you have any questions, please do not hesitate to let us know.

Regards,

Melissa S. Geller

Partner

Duane Morris LLP. One Riverfront Plaza 1037 Raymond Boulevard, Suite 1800 Newark, NJ 07102-5429 P: +1 973 424 2016 F: +1 973 556 1562

MSGeller@duanemorris.com www.duanemorris.com

#### AFFIDAVIT OF FACTS

- I, Brandon Green, DO HEREBY SWEAR, Under Penalty of Perjury, that the following information is true and correct, to the best of my knowledge, understanding, and belief [FN 1]:
- 1. In or about December of 2016, a multi-count Indictment was returned against me and several others;
- 2. The Three Counts against me in the Indictment were: Count-One: Racketeering Conspiracy, with an Attempted Murder and Conspiracy to Commit Murder in Aid of Racketeering, Count-Four: Conspiracy to Distribute Controlled Substance(s), and Count-Five: Use of a Firearm in Connection with Racketeering and Narcotics Conspiracy;
- 3. Prior to this indictment, the Government had tried to indict myself, and the other co-defendants;
- 4. An attempt by them to indict myself and the other individuals in 2014 came back No-Bill, and the Government eventually indicted Latique Johnson on a RICO offense "by himself";
- 5. In 2016, this Indictment, solely with Mr. Johnson, was superseded to add myself and the several others (this was the S3 Indictment; the one we were brought to trial on was S5);
- 6. On or about May 16, 2017, I was arrested for this Case, in Bridgeport, Connecticut;
- 7. I was initially appointed the Attorney Susan Walsh, as Counsel for this Case shortly after my arrest; not long after my arrest, Ms. Walsh came to see me at the Metropolitan Correction Center (MCC), in Manhattan, New York;
- 9. When Ms. Walsh came to visit me, I asked her to submit a bail application on my behalf; and, I told her that I had 5-7 signatures of working people, and my daughter's grandmother was willing to Co-Sign her property to put towards bail;
- 10. Ms. Walsh, despite my requests, never moved the District Court for bail on my behalf;

- 11. Ms. Walsh also came to visit me at MCC to discuss a plea offer by the Government;
- 12. This was the Government's first plea offer; and it was for 10 years to life, for RICO Conspiracy, and a separate narcotics conspiracy 841 (b)(1)(a), attached with the 851 enhancement, which double the mandatory minimum to 20 years (See Exhibit "A" A letter from Ms. Walsh showing the existence of this plea, which the Government is not handing over: likely because it was not legal, like everything else that has taken place here);
- 13. And, when offering me this plea, Ms. Walsh stated: "the Government doesn't want you, they want Mr. Johnson"; that he is a "very bad man"; and, that "they will relocate you and your loved ones" (paraphrasing Ms. Walsh);
- 14. Later, Ms. Walsh came to see me again at MCC, and provided me with the Government's second plea offer for: RICO Conspiracy, and a separate narcotics conspiracy 841 (b)(1)(b); this plea had me placed in a criminal history category VI career offender, but the Government agreed to drop the gun count (regarding this, Ms. Walsh sent me a letter stating: This plea was forwarded to her last night, "the guidelines are very high but the mandatory minimum was reduced to 10 years" only because of the prior felony 851 enhancement);
- 15. Ms. Walsh came to see me again, to extend the Government's third plea offer: RICO Conspiracy, and a separate narcotics conspiracy 841 (b)(1)(b), with prior felony 851 information still attached; and she informed me that: with this new plea agreement I was no longer considered a career offender--instead, I was placed in criminal history category III (See Exhibit "B", Letter from Ms. Walsh);
- 16. Around this time me and Ms. Walsh began to have severe disagreements with how my Case was being handled; with what issues I wanted raised; and, with her continued attempts to try and get me to cooperate with the Government (on several occasions Ms. Walsh tried to talk me into cooperating/working with the Government; to help them with their fabricated case against myself and the other defendants--however, I expressed to her that I did not want to go this route. In spite of this, Ms. Walsh still continued to try and persuade me to cooperate);
- 17. Consequently, due to my and Ms. Walsh's disagreements, and my dissatisfaction with her representation the District Court relieved her as counsel for this case (this was some time in or around 2018);

- 18. The Court, after relieving Ms. Walsh, appointed the Attorneys Eric R. Breslin and Melissa S. Geller, from the law firm Duane Morris;
- 19. In or around 2018, Ms. Geller came to see me at MCC, and I informed her of, inter alia: the plea offers I received from Ms. Walsh, and moreover, the discussion that me and Ms. Walsh had (see Paragraphs 7-17, above); and, moreover, I informed her of the reasons why I no longer wanted Ms. Walsh to represent me; also, I informed Ms. Geller that: I was innocent of all charges, and that the entire Case against me was fabricated;
- 20. Additionally, I informed Ms. Geller that Michael Evans (aka "Puff"), and David Cherry (aka "Showtime"), were still friends up until the arrest, so none of this could be true (referring to the murder conspiracy plot/charge); I also informed her that I did not know David Cherry; And that I saw David Cherry at M.C.C and he told me that: He informed his lawyer that the government is lying, that he knew Puff (Michael Evans) since around 2006 or 2007 and that they are still friends, and that he also told his lawyer that he was introduced to me one time by Michael Evans at BBQ's when I got out of prison.
- 21. After informing Ms. Geller of those things listed above, she asked me if I would help in assisting the Government; at this time Ms. Geller asked me if she got me out on bail, or if I got out on bail, would I be willing to cooperate;
- 22. In response, I informed Ms. Geller that I do not know these people; Michael Evan's and I are like family; that I did a couple of music videos for Mr. Johnson; that I didn't know anything; and, that these charges are made up (fabricated);
- 23. Ms. Geller still tried to talk me into cooperating after I told her this: She stated, you speak properly, and therefore could make a great witness, and could satisfy the elements;
- 24. I maintained to Trial Counsel that I was innocent of all charges, and that I had nothing to say to the Government;
- 25. I informed Mr. Breslin and Ms. Geller that I wanted them to attack this case at the roots, starting with the investigation, the Affidavits of Agents Snead and Serotta, and, I told them to review the Grand Jury minutes because it was obvious that the Government lied to and misled the Grand Jury;

- 26. I informed Mr. Breslin that I wanted him to argue Carpenter; to attack the Government's affidavits and their obtaining of Electronically Stored Information from any and all cell phones allegedly obtained from me; and, I told him to challenge the paid informant used to obtain my cell phone number;
- 27. I informed Mr. Breslin on several occasions, in person, and via emails and other written correspondence, that I wished for him to move to suppress all evidence in the Government's case against me;
- 28. Trial counsel ended up moving to suppress some of the evidence associated with this Case; however, he did not move to suppress everything like I had asked, and he failed to incorporate my arguments;
- 29. For example, regarding the search of the home in Bridgeport, Connecticut, trial counsel failed to argue or moreover challenge, inter alia, the illegal stop of Ms. Turcios, the illegal ensuing entry into the apartment, the agents illegally taken her cell phone and house keys, and the subsequent illegal search and illegal seizure of the alleged evidence found therein;
- 30. That's not all that trial counsel failed to argue or challenge with respect to said search; for example, trial counsel failed to argue that Ms. Turcios withdrew her alleged permission once she entered the apartment; that she was taken upstairs to the balcony in her bedroom where they had guns laid out on her bed, including a pink handgun--the one she was coerced with, along with the rest of the firearms on the bed (only then she gave consent, but that consent was not valid);
- 31. In or around December 2018, in an email, after trial counsels attempt to suppress the firearms failed at the suppression hearing, I asked him to appeal the District Court's denial, and, if that did not work, to move to exclude the firearms in a motion in limine; I asked him this right before trial while he was drafting the limine motion; moreover, among other things, I told trial counsel that when I was arrested, I was on the first floor, and that the Officers made me back up towards the front door, therefore, they had no reason to come into the home and go on the second floor, however, trial counsel failed to correctly argue this;
- 32. In response to my requests to attack the Agents Affidavit(s) mentioned above (See Paragraph 25), and to suppress the evidence associated with this Case, Mr. Breslin informed me, via email(s), that he would have to file another suppression motion, and, that he was "NOT DOING THIS!";
- 33. I continued to ask trial counsel to do these things; however, they were not done (this is apparent from the Record);

- 34. Trial counsel failed to look into nearly everything I asked prior to going to trial;
- 35 From around December 2018 through January 2019, Mr. Green has an abundance of emails asking trial counsel to please allow him to review the 3500 Material; trial counsel failed to allow me to review all the 3500 material prior to trial; I complained to trial counsel about my Co-defendant(s) Lawyers coming to see him often to go over and review the 3500 materials with them prior to trial; trial counsel failed to do this with me; trial counsel never allowed me to view Officer Sisco's 3500 material; even as I submit this sworn affidavit I have yet to view the entire 3500 material and/or trial exhibits (for example "exhibit 1012" which is a stipulation between the government and trial counsel stating among other things the Bronx District Attorneys Officer dismissed the August 3, 2010 Traffic Stop);
- 36. Trial counsel never looked into or investigated the Government's Western Union Summary Charts, like I asked. I told trial counsel I never went to the town of Elmira, and, I never made these transactions, to challenge such, and/or, to reach out to an Expert Witness to refute these Western Union Charts;
- 37. Trial counsel should also have pointed out to the Jury that the Government's alleged Western Union that they claim was sent to CW-Rosario for \$2,000, from Saeed Kaid (a/k/a O-Dog) to allegedly purchase heroin from me, was not on the Government's Summary Chart, despite the fact that you must have an Identification Card (ID) to pick up or send any Western Union over around \$500/999.99;
- 38. The truth was this Western Union transaction never took place, and this would have been established had trial counsel looked into and investigated the Western Union transactions, and moreover, the Government's Summary Charts and proposed testimony and evidence regarding such;
- 39. Trial counsel also should have raised the following issues regarding the Western Union Summary Charts (Government Exhibit(s) 500, 501, 900): 1. the Western Union Charts did not have any NYCID (New York City Identification Numbers) associated to any of these names on the ID's and/or transaction; 2. The Brandon Green in these charts had 3 different home addresses on each of these I.D'S, and, it had No NYCID numbers on these ID's, for each of these three alleged transactions, and 3. none of them were the addresse(s) of where the Government alleged Brandon Green lived at and operated out of, which is the Honeywell complexes, and/or the addresses in agent Snead and Serotta reports where they claimed Mr. Green lived at in their affidavits; 4. The government did not have an expert testify to these charts/transaction either they used their own Paralegal Ms. Harney and trial counsel failed to OBJECT or challenge this in any way; 5. All of these alleged transaction from "the Brandon Green" took place in 2014, trial counsel should have also argued that by 2014 which the government claims is when Mr. Green made these Western Union Transactions from the town of Elmira The alleged Greyhound operation and, each of its members were ALL in prison since March of 2013; Mr. Green also told Trial

Counsel that CW-Adams lied about him coming up to Elmira (he was the only CW to say this), once with this "Bezo" person and/or another time with Mr. Johnson; This could not be true though, even the Governments CW-Rosario stated Mr. Johnson NEVER came to the town of Elmira, and he never testified to Mr. green ever coming to Elmira; Counsel DID NOT even Object like Mr. Green asked to these crafted Western Union Summary Charts that was designed by the governments own trial Paralegal Ms. Harney;

- 40. Prior to trial I informed trial counsel on several occasions that I did not agree with the Government's use at trial of a Traffic Stop that I was involved in, with Michael Evans (a/k/a "Puff) and Crystal Williams, back in August of 2010 (hereafter "the Traffic Stop");
- 41. I informed trial counsel that I never possessed anything illegal that day; and, that the Officers involved wrongfully pulled us over, then severely beat me, before asserting that I had cocaine on me;
- 42. I informed trial counsel that first and foremast, I did not feel that the traffic stop, and more specifically the alleged evidence associated with it, should be allowed to be used against me at trial because, among other reasons, the officers involved in the State case illegally obtained that evidence—it was the fruit of a poisonous tree, and I told trial counsel this;
- 43. I told trial counsel that the arrest ensuing from the traffic stop was dismissed, because the State Court Judge involved in that case had found that our rights were violated (also in the car that day was the vehicles owner and driver, Crystal Williams);
- 44. I informed Trial Counsel to look into the Disposition from that case, and they would see this;
- 45. I also informed trial counsel that I filed a Civil lawsuit because of the violations of my rights that took place during the traffic stop; and that I was awarded money as a result of my civil rights claims against those Officers, and the New York City Police Department;
- 46. I informed trial counsel that I had did depositions for that lawsuit, and maintained throughout the entire proceedings that I did not possess anything illegal that day;
- 47. I told trial counsel to call the passengers of the car from the day of the traffic stop, and that they would corroborate my contentions that I did not possess anything illegal that day;

- 48. I told trial counsel who my civil attorney(s) were for that case, Michael and Peter Ridge; and, I had them send trial counsel my client file for that case, which contained, inter alla, the Certificate of Disposition for that case (hereafter "the Disposition";
- 49. For some reason, however, trial counsel kept telling me and everyone else that the Disposition from the Traffic Stop Could not be located (trial counsel even stated this to my family);
- 50. I kept informing trial counsel that I disagreed with the Government's use of the traffic stop at my trial, especially the alleged evidence associated with such; however, trial counsel just kept telling me that the Disposition could not be located;
- 51. This is also what trial counsel said to the Court on several occasions; however, this was a lie (see Exhibit "C" An Email from Ms. Geller to AUSA Jessica Feinstein, that had attached therewith, inter alia, the Disposition);
- 52. I even discovered from a lawyer for one of the other defendants that the lawyer also told Ms. Geller to move to suppress the traffic stop and moreover, the evidence associated with it;
- 53. However, trial counsel never moved to suppress the evidence associated with the Traffic Stop, nor did they attempt to exclude such in a motion in limine--in spite of me and another attorney for a defendant in this case asking;
- 54. I maintained to trial counsel that I did not possess anything illegal on the date of the traffic stop; and I requested trial counsel to look into the backgrounds of Officer Sisco, and all the other Officer(s) involved in the traffic stop with violating our rights, and using excessive force on me;
- 55. Had trial counsel looked into their backgrounds, trial counsel should have seen all the civil suits filed against Officer Sisco for similar complaints as I had, for "excessive force", "fabrication of evidence", "false arrest", and "illegal search";
- 56. Trial counsel should have moved to suppress / exclude the traffic stop from being used at trial here; and, in the alternative should have put forth evidence for the Jury to infer that it is likely that the officers involved fabricated (planted) evidence on me to diminish / justify their false arrest, illegal search, and use of excessive force (I was very badly beaten, and had to be taken to the hospital; even the first

appearance judge noticed my injuries, and released me on my own recognizance (ROR'd), which can be viewed from review of my ST. Barnabus Hospital and MCC medical file(s));

- 57. Officer Sisco seems to show a pattern of violating the rights of those who he encounters, and it's clearly probative of his conduct in Mr. Green's case;
- 58. In or around April of 2019, I informed trial counsel that a loved one located the Disposition from the August 3, 2010 Traffic Stop (See Exhibit "D"); and, I informed trial counsel that, among other things, I felt they had colluded with the Courts and Government to wrongfully convict me: For instance, I pointed out that the Disposition stated the state Court Judge, the Honorable Judge Greenberg E., dismissed all pending criminal charges related to the traffic stop; and this is different than what the Government and Trial Counsel stipulated to, which was that the "Bronx District Attorney dismissed the charges" (See Trial Transcript Pg. 2884), however, that was not true, and the only mentioning of this anywhere else was the Court's statement at trial that:

THE COURT: I guess I'm under the impression the DA;s office dismisses all the time in cases where it concludes that there might be a search issue... .

Trial Transcripts Pg. 25 LL 22-24;

- 59. Moreover, I went on to point out to trial counsel that the email I found (see Exhibit "E"), shows that trial counsel lied to and misled me and my family, when trial counsel stated to us and even to this Court that the disposition could not be located, see TT Pg.(s). 19-20; when in fact that the email shows that trial counsel had this information, and even sent it to the United States Attorney's Office pursuant to their Discovery (Brady/Giglo) obligations, ergo, the District Court Judge, Paul G. Gardephe, knew this when he insinuated to the Government and trial counsel that the District Attorney's Office dismisses cases all the time (I informed trial counsel that I felt that the Court's led them and the Government to lie here and Stipulate to the Bronx D.A. dismissing the case stemming from the traffic stop, when the truth was that the state court Judge dismissed it, because of the violations of the Constitutional rights of myself and the other individuals involved in that incident);
- 60. Furthermore, I informed trial counsel that the Court knew or should have known that the state case was not dismissed by the Bronx D.A., it was dismissed by the state Judge, and also should have known that Ms. Geller was lying about not being able to locate the disposition, because the Court stated that it had reviewed all the 3500 material for this case, see Trial Transcript Page 2961, and the disposition, among other things, from the August 3, 2010 Traffic Stop was within that material; I, even informed Ms. Dolan about these things;

- 61. Prior going to trial the Government had tried to extend approximately six (6) plea offers in writing, and there was another one that I never seen, but that Trial Counsel orally presented to a family member(s) and told them to try to convince me to take this plea;
- 62. The fourth plea offer was extended by trial counsel, and it was a 7 year minimum mandatory plea with a brandishing a firearm in connection with the Showtime Murder Conspiracy; it was when Trial Counsel brought me this plea that he informed me that I was simply "collateral damage", in response to my maintaining to him that I'm innocent of all the charges here;
- 63. The Fifth plea was for a Racketeering Offense, with no mandatory minimum, and it was only available from October 10th, 2018 until October 12th, 2018, for two days; this plea offer was already expired when Trial Counsel finally conveyed it to me sometime towards the end of October (MCC Legal Visit Logs and Camera Records will show that Trial Counsel never came to MCC while this plea was still active); also, emails between Trial Counsel and the Government will show that the Plea was expired while they were still negotiating it (an email(s) between AUSA Ms. Nichols to Mr. Breslin stated, inter alia, that: Even if we drop the leadership enhancement, after trial the Judge will still find it applicable to him);
- 64. The sixth plea offer was in December 2019, and was for Racketeering, and a narcotics conspiracy, with an 851 enhancement, for 10-life, with a criminal history category III, Mr. Breslin told me about this plea over the email;
- 65. On or about February 15, 2019, at a hearing prior to trial, the Government had stated that all pleas are off the table; then, after Court, trial counsel told my family, at the Courthouse, that they got me another offer (this was the 7th Plea Offer), and were going to MCC to see me to present it to me-however, this was a lie. They had my family thinking and waiting in front of the MCC building like they were going inside the facility to discuss this plea offer with me--this never happened;
- 66. Trial counsel failed to adequately go over all the Government's plea offers with me; and, moreover, did not present all of these to me in a timely manner; also, trial counsel failed to consult with me regarding their written submissions, and even emailed me and stated that they could not promise me that they would go over all submissions with me prior to filing; and, trial counsel also entered into several stipulations without first going over those things with me, and stipulated to things in spite of my objection(s);

- 67. Trial Counsel lied to and misled me and my family regarding this case, and their representation of me; and I have evidence to prove this;
- 68. Among other lies told to me and my family by trial counsel was that Trial Counsel had come to MCC to visit me on or about February 18, 2019;
- 69. Moreover, it can be proved here that trial counsel lied to me and my family because I have the electronic messages that trial counsel sent to my family, pretending to be at MCC visiting me to extend me the offer; however, MCC Legal visit records and camera footage from the facility will show that this never occurred, trial counsel never came to see me this day to go over this plea offer; furthermore, later, trial counsel asked my mother and Ms. Arceneaux to convince me to take the plea, and he later text Mr. Green's family that night, asking: "Any news?";
- 70. Trial counsel should have moved to allow the admission of the civil lawsuits against Officer Sisco, and any and all other Officer(s) involved in the traffic stop;
- 71. I maintained to trial counsel that I never went up to the town of Elmira, nor did I ever supply any of these people with any type of narcotics;
- 72. I informed trial counsel to test the DNA on the alleged firearms seized in the Bridgeport CT residence, and I also told trial counsel to call a witness at, Mr. Swinney, to trial who would have testified to the fact that I never owned or possessed any firearms (the witness would have testified that the firearms belonged to him); moreover, this witness was available and willing to testify, and even told trial counsel that he would in fact testify to this if called as a witness;
- 73. I informed trial counsel to challenge the fake identification with my picture on it; That I.D was created well before this indictment came about check the expiration date on the I.D that was recover in Bridgeport;
- 74. I asked trial counsel to hire expert witnesses to help us with our defense; to get, inter alios, a gang expert, voice expert, firearm expert, law enforcement expert from the town of Elmira (EPD or State Troopers who initially investigated this drug ring from NYC to Elmira), and an expert for the Western Union Transactions;

- 75. Trial counsel stated in closing that the only thing that connected me to the town of Elmira Drug Conspiracy was the alleged Western Union transactions; and trial counsel failed conduct an adequate investigation into, and moreover failed to object or otherwise challenge these transactions in spite of me requesting several times that this be done;
- 76. I went to trial in February 2019; and it lasted approximately five (5) weeks;
- 77. I felt forced to trial here [EN 1], and that my Trial counsels were prevented from meeting the prosecution's case due to overzealousness of the Government Officials in this Case (which is evinced by, inter alia at my trial, the lack of foundation the Government was allow to lay when it witnesses were testifying against me especially--a fact even the District Court noted on Several occasions;
- 78. Prior to going to trial, I informed trial counsel to contact my Federal Probation Officer, Robert Walsh; that he would be able to establish that I did not live at the Honeywell Complexes, as was testified to by the Government's cooperator(s) at trial;
- 79. After the verdict of the Jury here, I informed trial counsel of the issues and arguments I wanted raised in my Rule(s) 29 and 33 Submissions; and I asked trial counsel on several occasions to first go over those Submissions with me before filling them; however, Trial Counsel did not do this;
- 80. There is so much that trial counsel did not do here that I have an issue with; most all of which I brought to his attention;
- 81. Among other issues I asked trial counsel to raise is the fact that he misstated a lot of things in their written submissions, to include the Pre-Sentence Investigation Report (PSR) responses and objections, and they failed to object to a lot of issues therein;
- 82. I maintained to trial counsel that I wanted to object to the PSR in its entirety, on top of raising specific objections to the things stated therein that I did not agree with;
- 83. I told trial counsel the specific objections that I wanted to raise, and brought up the discrepancies I had with the process in which the PSR was drafted: Its clear to me that the Probation Officer here was very bias, and deprived me of my rights here arbitrarily conducting an unfair report;

- 84. Like everything else, trial counsel did not incorporate my arguments into, inter alia, his suppression motion, the PSR, and the Rule(s) 29 and 33 Motions, and, as stated earlier, failed to correct the grossly deficient document;
- 85. The Government misconduct in this case starts at its inception, continued all throughout the trial, and did not stop once the trial was over; and review of the PSR shows this;
- 86. What the Government did here was wrongfully charge me with crimes they know that I did not commit, in an effort to get me to become a cooperating witness for them in their case against Latique Johnson; however, when I refused the Government's offers, their acts of malfeasance continued;
- 87. It was not just me that the Government sought to punish for not helping them, either; they also were involved in maliciously, and selectively attacking my family and loved ones;
- 88. The Government was allowed to get away with too much throughout the Course of my prosecution, and it did not help that they received little to no resistance from my own Attorneys and the Court--it's as if Trial Counsel was working for the Government, not me;
- 89. I'm not the only one who suspected trial counsel of being in bed with the Government here either; a family member of mine was in Court during trial, and at recess overheard Ms. Feinstein yelling at Trial Counsel, Ms. Geller, asking: "How could you do this to me";
- 90. It is believed that this argument was brought about because I insisted that Ms. Geller bring to the Jury's attention that I was disengaged in the "Club Heat" video shown by the Government: On the video, at Club Heat the Government showed what they alleged was a Gang rivalry argument going on, however, I was on the video just standing there on my cell phone, and/or with my hands in my pockets—I made Ms. Geller point out that I was not at all participating in what was going on, and Ms. Feinstein was angry at Ms. Geller for this because Ms. Geller was not really supposed to be helping me, but the Government. (Ms. Geller was probably doing this to earn favors so she can get a job as an Assistant United States Attorney; Ms. Geller wanted to be an AUSA, but she did not make the cut when she got out of law school);
- 91. The Club Heat video was the only evidence that the Government had with all three trial defendants in it, Mr. Green, Mr. Murray, and Mr. Johnson;

- 92. Among other issues with the Rule(s) 29 and 33 Submissions was that Trial Counsel said that I gave Adams a .22, and had a big scale; which was something that Trial Counsel also said to the Jury at my trial during opening statements;
- 93. However, I was never found to be in possession of "any" scales whatsoever; nor did the Government possess any big scale(s) in their Case against myself and the other defendants here;
- 94. Also, Mr. Breslin admitted to me that he thought the Government's Star Witness, CW-Mr. Adams, committed perjury, and he filed this in his Rule(s) 29 and 33 Submissions; however, once the Government addressed his allegations of perjury inside their rebuttal, Mr. Breslin withdrew his argument; and he did this with, among other things, his 403 objection to Officer Sisco's testimony and moreover the evidence associated with the traffic stop;
- 95. I then asked trial counsel to correct and amend the Rule(s) 29 and 33 Submissions; and to move for a Stay in the proceedings so that this could first be done before moving forward to address any and all issues with the PSR;
- 96. In response, Mr. Breslin emailed me stating that there was "no such thing as a STAY", and then he went on to say that "no one is giving you a STAY";
- 97. In or around June 2019, I sent a Motion to the District Court requesting, inter alia, a Stay; however, this was not filed/uploaded to my Docket until, January 8, 2020;
- 98. As time went on after I continued to feel as though I was being misled by everyone here, including trial counsel; so, I continued to look into my issues myself, constantly studying and learning more about my case and the law--especially my rights;
- 99. The more I looked into things, the more I seen was not done in my case; and it got to the point where I no longer felt that my trial counsels were in my best interest; therefore, I asked the District Court to relieve them from my case, which the Court did;
- 100. To replace trial counsel my family hired the Attorney Zoe Dolan, from California, for sentencing; and, she agreed to help me amend/supplement the Rule(s) 29 and 33 Submissions as a favor;

- 101. Even before hiring Ms. Dolan, she stated that Trial Counsels Post-Trial Submissions were rather "paltry";
- 102. Before hiring Ms. Dolan I stressed to her my dissatisfaction with Trial Counsels performance pre-, post- during, and after trial, and the prosecutorial and government misconduct that took place, as well as my overall concerns about this case;
- 103. On July 25, 2019, the District Court held a Substitution Hearing for the appointment of Ms. Dolan, at which time the Court stated to her that: trial counsel, Mr. Breslin and Ms. Geller, did an excellent job here; that they performed admirably, and the I was the benefactor of excellent representation both in their written as well as their in court performances;
- 104. After hiring Ms. Dolan, I continued to voice my overall dissatisfaction with trial counsel, and this Case;
- 105. I told Ms. Dolan the same things I stated to the District Court regarding my issues with trial counsel, and my fears regarding the Government's malicious and wrongful prosecution of me;
- 106. I informed Ms. Dolan that I was not happy with trial counsels written submissions, to include the Rule(s) 29 and 33 Submissions;
- 107. I stated to her that trial counsel failed to go over these Submissions with me prior to filing them, and consequently, did not incorporate my arguments that I wanted to be raised; moreover, trial counsel failed to correct these things once made aware of such by me: i.e., when I informed trial counsel that certain arguments were not raised therein, and when I asked them to be raise, these things were not done; and at times, trial counsel even refused to
- 108. I told Ms. Dolan in person and in emails that trial counsel deprived me of the effective assistance of counsel guaranteed to me by the U.S. Constitution; and I maintained to her that the Government engaged in a series of misconduct here in an effort to wrongfully prosecute convict me;
- 109. Moreover, I unequivocally informed Ms. Dolan in person and in emails and written correspondence that I wanted to raise claims of ineffective assistance of counsel (IAC) and prosecutorial misconduct prior to sentencing;

- 110. However, Ms. Dolan informed me, on several occasions, in response that these are issues that are to be raised via a Section 2255 petition, "not a Rule(s) 29 and 33 Submission";
- 111. On September 12, 2019, Ms. Dolan replied back to several of my emails, and informed me that she intended to supplement the Rule(s) 29 & 33 Submissions with the Supreme Courts recent Davis decision; also, she informed me that her professional opinion as to most of my arguments, particularly my attacks on Breslin and Geller, are more appropriate for a 2255 petition;
- 112. On October 7, 2019, Ms. Dolan sent me an email stating, inter alia, that "the Sisco details you're pointing out are more of a 2255 issue", as it relates to the performance of Breslin and Geller; and, she "agree[d] that the prejudice was very harmful";
- 113. On July 24, 2019, I emailed Ms. Dolan to inform her I was working on my own Sentencing Memorandum (hereafter "the Sentencing Memorandum");
- 114. On that same day, when Ms. Dolan came to visit me at MDC, I informed her that an attorney for another defendant on this case was visiting their Client, and asked me to remind her to reach out to get some details regarding Ms. Geller's and Mr. Breslin's failure to move to suppress or otherwise exclude the testimony and alleged physical evidence associated with the traffic stop;
- 115. This was not the only time I informed Ms. Dolan of the issues surrounding this case that I wanted raised, to include the issues surrounding the traffic stop;
- 116. I told Ms. Dolan to look at the Disposition from that stop, and to look into the case, and she would see that my trial counsel was ineffective for, inter alia, not moving to suppress or otherwise exclude the testimony and alleged evidence associated with that case;
- 117. I did the best I could to adequately apprise Ms. Dolan of all of the issues that I had here, and even sent her a document I called "the Guide" (see Doc. No. \_\_\_\_\_); which I feel was legally sufficient enough to apprise her of my claims to the point where she should have conducted further investigation into such prior to moving forward with my sentencing;
- 118. These complaints of mine to Ms. Dolan fell on deaf ears, though; she failed to look into my arguments and issues, and told me my concerns are to be raised in a 2255 petition, "not a direct appeal";

- 119. At the time of her telling me this I was not sure about the law, however, I felt that these issues of mine relating to the violations of my rights needed to be addressed before I was sentenced; that's why I tried to raise these concerns in the Sentencing Memorandum;
- 120. I sent the Sentencing Memorandum to the District Court on October 30, 2019--a day before my then scheduled Sentencing Hearing;
- 121. On that same day, Ms. Dolan informed me that the Government had extended an offer to me, letting me know that it was not too late to cooperate;
- 122. On October 31, 2019, at my Sentencing Hearing, in response to the Sentencing Memorandum, the District Court postponed my Sentencing; because, the District Court said it felt in its gut that there was a need to first look into my Claims raised therein;
- 123. It was later found out by me that Ms. Dolan misinformed me regarding the law surrounding my claims; and she never looked into, among other things, my complaints about Trial Counsel (I know this because I recently found out that she was never able to review the Client File of Trial Counsel because the Flash Drive that it was on either had a virus or was corrupted/did not contain any readable data);
- 124. Ms. Dolan never looked into these things, and never supplemented/amended the Rule(s) 29 and 33 Submissions like I asked; though the District Court did rule on those Submission prematurely, after I had already voiced my concerns to the Court that I had with Trial Counsel and the Rule(s) 29 and 33 Submissions (I had sent the District Court my Supplemental Declaration to the Rule(s) 29 and 33 Submissions, wherein I voiced some of my concerns with this Case that Trial Counsel failed to argue);
- 125. Ms. Dolan did do a Reconsideration Motion for the District Court to reconsider its denial of the Rule(s) 29 and 33 Submissions;
- 126. I informed Ms. Dolan in her Reconsideration, to not allude to me being guilty of "ANYTHING" criminal alleged by the Government; especially, the alleged cocaine allegedly found on me by Officer Sisco during the traffic stop;
- 127. However, Ms. Dolan, despite my requests, did allude to me allegedly being in possession of this cocaine;

- 128. In addition to the facts and information sworn to by me in this Affidavit, I've also submitted a Petition to, inter alia, the District Court, the Department of Justice (DOJ), U.S. Attorney General, and the New York State Attorney General, which is sent herewith, and more fully describes all of my claims raised in my collateral attack on my conviction(s) here;
- 129. Lastly, I want it to be known herein that I'm submitting this Affidavit, along with the accompanying documents, as earlier as I possibly could have, given, among other issues, the fact that there was no printer paper for nearly a week, making it difficult for Mr. Green to complete this, and other documents;
- 130. Mr. Green submits that in light of these prejudices stated herein, and within his multiple requests for more time from this Court (for example, the fact that MDC was on complete lockdown recently for several months, and when we were finally let out, the computers and phones did not work;
- 131. Additionally, in light of recent concerns regarding what Mr. Green avers is personal biases and prejudices of the Judge assigned to this Case, the Hon. U.S. Dis. Court Judge, Paul G. Gardephe; and due to the fact that claims raised herein relate to the Judge, Mr. Green submits that he feels compelled to move the Judge to Recuse himself (for more on this, see the Cover Letter accompanying this Affidavit);
- 132. Moreover, because the Judge recently denied Mr. Green's extension of time to submit this Affidavit, Mr. Green feels forced to submit this document without having all the information that he still needs, and has been requesting for nearly two years, to include the "entire" Client File of his Trial Counsel; however, when he does receive and get a chance to review all of that information, he reserves the right to amend/supplement this Affidavit, to include any additional argument(s) and exhibits resulting from my review of the Client File (for more on my not yet receiving and review the client file / entire client file, see accompanying documents sent herewith);

#### ENDNOTE(S)

<sup>1.</sup> In an email sent to Trial Counsel by the Government, the Prosecution stated: Based on our prior conversations, it seems like your client does not want to go to trial. See Exhbit "F", Email from AUSA Jessica Feinstein to Trial Counsel, Dated December 21, 2018. This supports my contentinos that I was forced to trial.

EXECUTED and SWORN to on this 23rd day of February, 2021.
Respectfully Submitted,
Brandon Green Reg. # 56400-054
Defendant, Pro Se
•
SWORN DECLARATION / OATH
I, Brandon Green, DO HEREBY SWEAR, Under Penalty of Perjury, that the information contained in the foregoing Affidavit is true and correct, to the best of my knowledge, Understanding, and Belief. See Title 28 U.S.C. Section 1746. On this 23rd day of February, 2021.
Signature:/S/
Print: Brandon Green

### FOOTNOTE(S)

<sup>1.</sup> Mr. Green has an abundance of emails and similar written correspondence between himself and the attorneys who have represented him in this Case. Mr. Green may reference those emails herein, and he will attach those he feels necessary to his accompanying Petition. Mr. Green can produce any and all these things if necessary.

## change.org

Recipient:

Andrew M. Cuomo, President of the United States, Federal Bureau of

Investigation

Letter:

Greetings,

Federal Judge Hangs Up On Defendant; Demand He Get a New Judge. Sign

this Petition

View petition at: http://www.change.org/NEW judge Brandon/Leen

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Suzette Ar Church Po		70525		########
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Jody Pace Chicago	60660 US	########
Émily Broa Matamoras	18336 US	########
Margaret I New York	10036 US	########
Rawnak Sc Bronx	10462 US	########
y h Los Altos	94022 US	########
Eleanor M. Minneapolis	55423 US	########
aiyana nel: Alameda	94501 US	########
Ayiana Lov Hahnville	70057 US	########
Zach Ecklu Seattle	98168 US	########
Abby Pauc Los Ángeles	90033 US	#######
Baku Usa Philadelphia	19120 US	#######
Ndeye-Kha Jersey City	7305 US	########
Dayli Craft Lakecourt	30248 US	########
wyatt beat Sioux Center	51250 US	########
Peyten Du Elkhart	46514 US	########
Timothy H Garrett	41643 US	########
Claire L Avon	6001 US	########
Taryn Carll Mckinney	75069 US	########
Amanda Ki Short Hills	7078 US	########
Sally Sesay Sterling	20147 US	########
James Gre Memphis	38111 US	########
Lauren Ste Miami	33142 US	#######
Ana Felder Evergreen	80439 US	#######
kelly koppi Columbus	43214 US	#######
Alexis Luja Albuquerque	87120 US	#######
Trisha mot Molalla	97038 US	#######
Stephanie Portland	97230 US	#######
Ashley red Queens	11373 US	########
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Sydney Tcl Ann Arbor	48103 US	########
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Simone McEast Brunswick	8816 US	#######
Burton Jan Warren	48088 US	########
Lieyla Diaz Gilroy	95020 US	########
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Marguerite Cerritos	90703 US	########
Bela Medii Orlando	32801 US	########
Carmen M King City	93960 US	########
Woodrow Houston	77038 US	#######
Melanie Tc Van Nuys	91401 US	#######
Yuki Traylc Melbourne	92124 US	#######
Adam Kalu Burleson	76028 US	########
Leah Nguy Fort Myers	33919 US	########
Tina Perun New York	11432 US	########
Keona Uhr Saint Paul	55103 US	########

Alan Rigga Columbus	43204 US	########
Ann Monre Birmingham	35223 US	########
Alaina Cair Sidney	45365 US	########
Rabecca St Middleburg	32068 US	########
Xavier O'N Tucson	85711-47C US	########
Jillian Kahr Forest Hills	11375 US	########
Michael G: Tampa	33617 US	#######
Heather Bl Euclid	44123 US	########
Andrew Pa Fresno	93711 US	########
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Jadyn Zech Cerritos	90703 US	#######
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Karna Saje Parker	55105 US	########
Mylie Pete Saint Paul	7202 US	########
sam johns Elizabeth	33138 US	########
Sarah Mar Miami	27893 US	########
Barbara Lc Wilson	24055 US	########
Amanda W Bassett	67530 US	########
Tamara M. Great Bent KS	94022 US	########
Phoebe Se Los Altos	23505 US	########
Natalie Jor Norfolk	75216 US	########
Haley Mad Dallas	10458 US	########
Kya Trentc Bronx	95518 US	#######
Chase Gro: Arcata	10022 US	########
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Tylynn Ma Philadelphia	83333 US	#######
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Makayla Ti Oxford	21230 US	########
Bryah Stok Baltimore	92399 US	########
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Dale Bolton	US 5225 US	########
Aniyah Spi Milwaukee	53225 US	########
Zaire Barrc Philadelphia	19120 US	########
Olivia Harr Farrockaway	11691 US	########
Ksenia Ure Chandler	85249 US	########
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Breyanna (Detroit	48235 US	
Melanie Cı Gatesville	76528 US	########
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Chrystal Si Bronx NY	10459 US	########
Lauren Ter High Point	27265 US	########
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Billy Reins Ledyard	6339 US	#######

	74112 US	########
Earnestine Tulsa	20871 US	########
Amber Rui Clarksburg	29201 US	#######
Ashley Clif Columbia	64055 US	########
Velva May Kansas City	48234 US	########
Jordyn Cle Detroit	17050 US	########
Kristen Ha Mechanics PA	77320 US	########
julianna ca Huntsville	32008 US	########
isabel garc Branford	74136 US	#######
Becca Nag Tulsa	77005 US	########
Davante N Houston	8053 US	########
Amanda S New Jersey	US	########
ciara c	33143 US	########
Logan Hrbi Miami	33143 US	########
Kyreem Taylor	8083 US	########
Joyce John Sicklerville	46324 US	########
Lena Frazir Hammond	40324 US	#######
Lashonda Seymour	40220 US	#######
Diana Brer Louisville	93455 US	#######
Lawrence   Santa Mar CA	95455 US	########
Christine Brady	10463 US	########
Milagros C Bronx NY	28269 US	########
Tamia Johi Charlotte	41042 US	########
Bianca Orc Florence	85302 US	########
Ananya Jal Glendale	85298 US	########
Abigail Mc Gilbert	222 US	########
Lila Shen Chino	93702 US	########
Andrea Va Fresno	93702 03 US	########
Analia Bridges	98012 US	########
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Sophia Hai Plano	17522 US	#######
Isabella Jacno where	70892 US	########
Kailen Mai Baton Rouge	24202 US	########
John hartn Bristol	94044 US	########
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Nevaeh Bc Rib Lake	70810 US	########
Amalee I. Baton Rouge	8043 US	########
liz sammar Voorhees	46143 US	########
Ainsley Sm Greenwood	92832 US	########
erin baek Fullerton	94501 US	########
Isabella de Alameda	94124 US	########
Jasmine Sa San Francisco	94502 US	########
Jaida Sieu Alameda	77098 US	########
Dani O Dallas	85082 US	########
Gina Dima Phoenix	98362 US	########
Hailey Arn Port Angeles	8062 US	########
Barbara Dı Mullica Hill	10460 US	########
James San <sup>-</sup> Bronx NY	10400 03	

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william se: Everett	2149 US	########
Kaci Coz Proctorville	45669 US 63130 US	########
maddie je: Saint Louis	11234 US	########
Rose marit Brooklyn	60602 US	########
Kennethia Chicago	40215 US	########
Teresa Bro Louisville	40215 US 10465 US	########
Bruce Geo Bronx	91913 US	########
Taylor Cas Chula Vista	91913 US 90011 US	########
Natalie Sal Los Angeles	76036 US	########
Jordan Cur Crowley	90001 US	########
Katie Rodr Los Angeles	90280 US	########
Esmeralda South Gate	2721 US	#######
Olivia DelV Fall River	77036 US	########
Lilian Xitar Houston	33167 US	########
Kske Rhhrl Miami	33068 US	########
CJ Magnet Jacksonville	32807 US	########
Kimberly R Tampa	79424 US	########
Maria Oliv Lubbock	22560 US	########
Vickie Also Tappahannock	92201 US	#######
Angelica A Indio	95546 US	#######
KANITA McHoopa	6517 US	########
Suzan Shui hamden	US	########
Fatu Seaay	75206 US	########
Mollie Dell Dallas	10011 US	########
Alla Pines Maribel M New York	11106 US	########
McKenna I Bluff City	37618 US	#######
Kate Sand: Castle Rock	80104 US	########
Tselmuun Hayward	94541 US	#######
Trinity Har Canfield	44406 US	#######
Ashley gor Tampa	33612 US	########
Darrell Val Thousand Oaks	91360 US	########
Maria s Brooklyn	11235 US	########
Jose G Fort mill	29708 US	#######
Laqui Alex: Atlanta	30341 US	########
Elizabeth S New Braunfels	78130 US	########
Tyler Spen Pittsburgh	15065 US	########
Anesha Kir Fife	98424 US	########
Danita-Ma New York	10003 US	#######
Lucky Lucy Paso Robles	93446 US	#######
Crystal RocSun City Center	33573 US	#######
CrystaL Rik Little Rock	72209-83C US	#######
Brayley Mr Brockton	2302 US	########
Morgan Fr Saint George	84770 US	########
Allison Far Islip Terrace	11752 US	########
Madeline J Fort Collins	80525 US	########
Jennah Ha Toledo	43623 US	#######

Lina Steph Conce	ord	94521 US	########
Xavier Jon: Deca		30034 US	########
Lisa Monte Blue		21218 US	########
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Willie McN Charl		28278 US	########
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Angelina N Cent		20120 US	########
Genesis Rc Colo		80909 US	########
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Edgar Mira Rich		75081 US	########
Lexi O'Don Brick		8723 US	#######
Branden Si Cher		8003 US	########
Makenzie , Linco		97367 US	########
Nina Sanfil Shirl		11967 US	########
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Remy Sosc Unic		7083 US	########
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Mar Lynch W, F William Rc Colu		21044 US	########
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Cesar Guill Woo		1506 US	########
Damian Ac Nev		37760 US	########
Cameron F Jeff		37312 US	########
Yakya Lind Clev		93105 US	########
Owen Hub San		46516 US	########
Alliyah a Tı Elki		95608 US	#######
Pamela Ro Car		94547 US	########
Bri Zantua Her		4101 US	########
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Cheyenne Oal		95205 US	########
Leslie TrejcSto		14127 US	########
Emma Gor Ord		14127 US	########
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Anthony B Let	oanon	45036 US	########
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Liuliic B = 0	ver	3867 US	########
Kayla Baco Gr		76051 US	########
Thomas B€ Oc		22125 US	#######
Nadia Mial Ste		48310 US	########
Sophia Re <sub>\</sub> Lo		90813 US	#######################################
Sam Hamil Oa		11769 US	
Anna Ham Br		10454 US	########
Adriana G: Lo		90802 US	########
George Co Au		78754 US	########
Alexis Penı Da	ahlonega	30533 US	########

Sófia The f Miltor	)	32583 US	########
Kate Broer Hemet		89129 US	#######
Carmen Za Selma		93662 US	#######
Mia R Tucso	n	85757 US	########
sosi a. Poton	nac	20854 US	########
Hike Alpaca		US	########
Yaritza Alv Tucso	n	85716 US	########
Olivia Wet Lovet	tsville	20180 US	#######
Gavin Brar East C	Quogue	11942 US	########
Andrea Sai Pico F		90660 US	########
Sela Hanse Fairbo		45324 US	########
kaitlyn salı east p	atchogue	11772 US	########
Pamela Se San Jo		95123 US	########
dayanara (Missi		39759 US	########
Juniper Sm Patch		11772 US	#######
Gabrielle ( Millb		36054 US	########
Tim Clark Moor		56560 US	########
Libby Devl Doyle	estown	18901 US	########
Giselle Vel Dalla		75159 US	########
Maggie St∈White	e Plains	10605 US	########
Vy Truong Tuala		97062 US	#######
Becky Bige Howe		48943 US	########
Nancy Cor Chica		60623 US	########
Devin Hud Dalla	-	75216 US	#######
Rachel K Seca	ucus	7094 US	########
Sydney Du Bellir	ngham	2019 US	#######
Kayla Turn Essex		21221 US	########
Marideza I Bost	on	2122 US	########
Eryonne Je Floris	ssant	63031 US	#######
Scarlet Hai Seat	tle	98105 US	########
Shanora W Aust	in	78727 US	########
Brianna As New	ark	7112 US	########
Reagan Wi Pine	ville	71360 US	########
William Dr Vern	on hills	60061 US	########
Hannah Al Beav	/er	25813 US	########
William Hc Nort	hridge	91325 US	########
Lillyan Col: Nasl	nville	37217 US	########
Alyssa Wik Hob	art	46342 US	
Marissa Re El De	orado Hills	95762 US	#######
Samantha Hou	ston	77002 US	#######
Maiya Kuw Hon	olulu	96818 US	#######
Madison H Rich	mond	94804 US	
Cynthia Br Stro	udsburg	18360 US	
Mackenzie Mac	comb	61455 US	
Debra Kee Clar	ksville PA	15322 US	########

# change.org

Recipient:

Donald J. Trump, Andrew M. Cuomo, Department of Justice

Letter:

Greetings,

RETRIAL DUE TO GOVERNMENT PERJURY & amp; IAC!

view petition at http://chng.it/hHJTp2nM

•	Cia	State	Postal Cod Country	Signed On
Name	City	State	US	########
Brandon Green	AlVaule	NY	10003 US	########
Lindsey Arceneaux	New York	MD	21234 US	########
Vicky Barnes	Parkville	NY	10471 US	########
Isaias M	Bronx		78626 US	########
theresa barksdale	Georgetown	TX	52761 US	########
Shannon Simpson	Muscatine	IA	8062 US	########
Barbara DuBois	Mullica Hill	8157	10457 US	########
Jocelyn Pacheco	Bronx	NY	10457 US	########
Melanie Rivera	Bronx	NY	10460 US 11733 US	########
Daniel Stenson	East Setauket	NY		########
Casey Roan	Bronx	NY	10457 US	######################################
Anthony Torres	New York	NY	10118 US	########
liyyah moore	Wilkes-Barre	PA	18702 US	
Sara Louati	Chicago		60634 US	########
Angelica Jones	Burlington		27217 US	########
Logan Miller	Effingham		62401 US	########
Tina Wake	Denver		80212 US	########
Touki tajwar	Jamaica		11433 US	########
Patrick W. Mulligan	Mims		32754 US	########
Jeremy Boyle	Lake Stevens		98258 US	########
Carlos Colon Torregrosa	Coamo		US	########
lizzy godwin	Lake Placid	FL	33852 US	########
Javid Anderson	East Orange	NJ	7017 US	########
Samantha Gonzalez	Bronx	NY	10456 US	########
Suzette Arceneaux	Lafayette	LA	70506 US	########
Corey Vasquez	Bronx	NY	10462 US	########
Michael Evans	Poughkeepsie	NY	12601 US	########
Emendjer Mathurin	Queens Village	NY	11429 US	########
Shonteya Sharp-Walker	Norwich	CT	6360 US	########
Jomal Bautista	bronx		10460 US	########
Adrienna Mckinnon	Harrison	NJ	7029 US	########
Shawn Jones	La Grange Park	IL	60526 US	########
JON INWOOD	Brooklyn	NY	11230 US	########
Lauren Brodie	Knoxville	TN	37921 US	########
Adam Kaluba	Burleson	TX	76028 US	########
areli miguel	Central Islip	NY	11722 US	########
Ashley Campisi			US	########
Shiloh Logan	Perrysburg	ОН	43551 US	########
Brenda Choi	Las Vegas	NV	89121 US	########
areli sam	Central Islip	NY	11722 US	########
Tiffany Lacen	Bronx		10459 US	#######
Christopher Martinez	New York	NY	10118 US	#######
Kenya Johnson	Fairburn	GA	30213 US	########
Crystal Serrano			US	########
erika dunkley	Springfield	MA	1101 US	########
Jeanean Green	Bronx	NY	10453 US	#######
Jeanean Oreen	D, OIM	,		

t				
Roseanne Vargas			US	########
Chinasha Herbert	Bronx	NY	10456 US	########
A Price	Norwalk	CT	6853 US	########
Mawuli Hormeku	Brooklyn	NY	11207 US	########
Raquel Greene	Chicago	1L	60602 US	########
Darius Byrd	Orlando	FL	32801 US	########
Cece Thomas	Orlando	FL	32808 US	########
Dwayne Latimore	Brooklyn	NY	11201 US	########
Caesar Pope	Brooklyn	NY	11221 US	########
Katia Almanzar	Bronx	NY	10463 US	########
Kaya Daley	Philadelphia	PA	19124 US	########
James Blount	New York	NY	10118 US	########
Michelle Green	New York	NY	10021 US	########
Mary Torres	San Antonio	TX	78210 US	########
Gloria Garcia	Merced	CA	95348 US	#######
Essence Shaylor	Bronx	NY	10457 US	########
Keisha Whitehead	Brooklyn	NY	11233 US	########
Stephanie Almonte	Bronx	NY	10452 US	########
Jennifer Burgos	Bronx	NY	10472 US	########
Jennifer Gregor	Groton	CT	6340 US	########
Argenis Polanco	Boston	MA	2116 US	########
Tamika Wiggins	New York	NY	10027 US	########
Robert Martin	Philadelphia	PA	19124 US	########
Pamelha Marte	Bronx	NY	10471 US	########
victor mercado	New York	NY	10118 US	########
Roberto Wright	Houston	ΤX	77054 US	########
Sammy Gil	Fort Lauderdale	FL	33328 US	########
Khambia Clarkson	Marshalltown		50158 US	########
Anthony Kidwell	Gainesville		32615 US	#######
Janis Chappelle	Des Moines		50314 US	#######
Naib Muhar	Livermore		94550 US	########
Shakeema Barcliff	New York	NY	10022 US	########
Dylan Verde	East Greenwich		2818 US	########
Adan de Andrade	Philadelphia		19031 US	. ########
Gisel Albino	Bronx	NY	10456 US	########
Sherri Hamler	Pickerington		43147 US	########
Kimberly Richards	Minneapolis		55411 US	#########
Troy Conyers	High Point	NC	27260 US	########
Jessica Williams	Brooklyn	NY	11207 US	########
DeputyMaryor Harms			US	########
Gen Lee	Bronx	NY	10456 US	#######
John Farrell	Eustis		32726 US	#######
Cole Mckeown	Cape May		8204 US	#######
Lucien Ford	Round Lake		60073 US	########
Marcus Jenkins	Vallejo		94590 US	########
donna dixon	San Antonio		78237 US	########
Ally White	Ooltewah		37363 US	#######
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Jinnette Ramirez	Bronx		10456 US	#######
Dylan Sitko	Davenport		52804 US	########
Syraida Morales Rodriguez	Orlando		32803 US	########
Marshall Tyree	Madison Heights		24572 US	########
Heeyoung Im	Tampa		33619 US	########
Donna Timoteo	Anchorage		99504 US	########
Jennifer McAdam	Wayne		7470 US	#######
Isaiah Walton	Naples		341117 US	########
Haha Hahaha	Pennington		8534 US	########
Brittney Jones	Detroit		48227 US	########
Greg Larko	Pittsburgh		15209 US	########
Abigail Carbajal	San Bernardino		92411 US	########
Corey Horton	Fairfax	VA	22038 US	#######
Katherine Cavanaugh	Pensacola		32507 US	########
Phyllis Novello	Murrieta		92562 US	########
A. Sunnie	Virginia Beach		23542 US	########
Stefanie Abreu	Bronx	NY	10457 US	########
Jennifer Hernandez	Bronx	NY	10456 US	########
Eddie Torres	Bronx	NY	10467 US	########
Jay Vasquez	bronx	NY	10472 US	########
Luis Lopez	Bronx	NY	10457 US	########
Chanel Swinney	New york	NY	10001 US	########
	New York	NY	10118 US	#######
Jeffrey Roy Malik Williams	Bronx	NY	10457 US	########
Drell Green	Middletown	NY	10940 US	########
	Bronx	NY	10451 US	########
Latrese Benjamin	Bronx	NY	10458 US	########
Dashawn Palmer	Bronx	NY	10460 US	########
Eric Swinney	Bronx	NY	10468 US	########
Kayle Rivas	New York	NY	10467 US	########
Michael Bailey		PA	18512 US	########
Juan Rodriguez	Scranton	NY	10457 US	########
Damaries Negron	Bronx	AZ	85031 US	########
Jason Futrell	Phoenix	CA	95822 US	########
Marissa Barrera	Sacramento	NY	10034 US	########
Veronica Castro	New York		10310 US	########
Heysha Osorio	Staten Island	NY	7106 US	########
Spring Rios	Newark -	NJ	10473 US	########
Claude Similus	Bronx	NY	10473 US	########
Felix Rodriguez	New York	NY		########
Roberto Cruz	New York	NY	10018 US	########
Oscar Cesar	Teaneck	NJ	7666 US	########
Jeannie Akvarez	Woonsocket	RI	2895 US	########
Lavonda Eadie	Staten Island	NY	10301 US	
Joseph Torres	Bronx	NY	10471 US	########
R J CONCHA	Bronx	NY	10458 US	########
Edwin Torres	New York	NY	10036 US	########
Yesenia Rodriguez	Bronx	NY	10451 US	#######

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lizane Acosta	Wilkes-Barre	PA	18702 US	#######
Stephanie Heinbockel	Bronx	NY	10456 US	########
Aida Solis	Bronx	NY	10456 US	########
Shondell Crocker	Newark	NI	7112 US	########
Thomas Vasquez	Bronx	NY	10460 US	########
Richard James	Bronx	NY	10469 US	########
Jacqueline Williams	New York	NY	10029 US	########
Jose Vasquez	Brooklyn	NY	11233 US	#######
William Martinez	Bronx	NY	10457 US	########
Christina Matos	Bronx	NY	10468 US	########
Lauren Labrada	Miami		33134 US	########
Vicky Lamier	Fayetteville		17222 US	########
Wilson Beers	Dayton		45429 US	########
Ben Swanson	Plymouth Mee	ting	19462 US	########
Victor Walker	Blacklick		43004 US	########
Jianbing Huang	Trumbull		6611 US	########
Kelly Chase	Nampa		83686 US	########
Ari Gray	Richmond Hill		31324 US	########
Jefg Chen	Downey	CA	90241 US	########
Joel Alger	San Diego		92038 US	########
Sarah Bonilla	Atlanta		30305 US	########
Shanequa McCrimmon	Brooklyn		11210 US	########
Jason Sanchez	Rockford		55373 US	########
EΑ	South Charlest	on	25309 US	########
Noemi Cancel			US	########
Jatin Chamdal	Cypress		77433 US	########
Donna Finch	Hoover		35226 US	########
Carolyn Mraz	Darien		60561 US	########
Garrett Smolen	Plainfield		60544 US	########
Garrison Manne	Norwalk		6850 US	########
Kelly Johnston	Clairton		15025 US	########
Nivea Jones	North Chicago	)	60064 US	########
Stephen Meilenner	Madison		53703 US	########
Kame Rut	River Forest		60305 US	########
Danny Alavez	Milwaukee		53215 US	########
Doris Cruz	Flushing		11367 US	#########
Jasmine Martinez	Lewisville		27023 US	########
Jenna懶 Butts	Paris		61944 US	#########
bianca moore	Downers Gro	ve	60515 US	########
Makayla Slimko	Varna		61375 US	########
Donna Mercado	Pocono Sumr		18346 US	########
Richhomiecuero_ Free	Da (Bronx	NY	10458 US	#######
Samuel asiedu	Bronx	NY	10457 US	#######
William Walvin	Bronx	NY	10458 US	#######
Edwin Torres	New York	NY	10118 US	#######
Luis Rivas	Wappingers		12590 US	#######
Jermaine Parson	Bronx	NY	10457 US	#######

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Billy Clooney	Roxbury	MA	2119 US	#######
Sharese Benjamin	Bronx	NY	10473 US	########
Ruben Guerrero	Bronx	NY	10458 US	########
Angel Rodriguez	Miami	FL	33169 US	########
Mike Antone	Fremont	CA	94536 US	########
Ethan Garcia	Manhattan	NY	109 US	########
Frederick Burke	Poughkeepsie	NY	12603 US	########
Jennifer Ramos	Bronx		10400 US	########
Edwin Lawrence	Waterville	ME	4901 US	########
Annisa Bean	Cincinnati		45215 US	########
Spencer Bynum	Portland		97220 US	########
John Kramer	Marshfield		2050 US	########
Lex Brewer	Kansas City		64121 US	########
Wae Gaddis	Oklahoma City		73132 US	########
Laraine Gunter	Mooresville		46158 US	########
John Feister	Downingtown		19335 US	########
Winnie Ho	Garden Grove		92843 US	########
DeAndre Coleman	Herrin		62948 US	########
Joseph Schindler	Philadelphia	PA	19119 US	########
Amanda Guerra	Laredo		78041 US	########
Manpreet Kaur	Stockton		95209 US	########
Darryl Bent	Hialeah		33012 US	########
Manuel Cortez	Manteca		95336 US	########
Bryce Cothran	Sebring		33875 US	########
Hammad Sattar	Chicago		60634 US	########
Young Young	Los Angeles		90009 US	########
Thomas Salisbury	Ponca City		74601 US	########
Paul Nelson	San Francisco		94109 US	########
Vidalina Hernandez	Bronx	NY	10467 US	########
angelina murray	Macomb		61455 US	########
Johann lozano	Roscoe		61073 US	########
Celeste Ruiz	New Year	NY	10457 US	########
Belinda Kragh	Eagle Rock		24085 US	########
Kierstyn Aldsworth	Glen Burnie		21061 US	########
Mad max			US	########
Aubree Lee	Zephyrhills		33543 US	########
Kittie Morton	Wyoming		49519 US	########
christian perez	Los Angeles		90046 US	########
Melissa Henry	Muskegon		49440 US	#######
Elizabeth Smith	Chicago		60690 US	#######
Jahmane Bright	Bronx	NΥ	10452 US	#######
Peter Schellhorn	Glenview	IL	60025 US	#######
Genessys Perez	New York	NY	10118 US	########
Maleek Beguesse	Bronx	NY	10457 US	#######
Michael Cummins	East Providence		2914 US	#######
Rosalia Ortiz	Bronx	NY	10469 US	########
Alexander Brown	Bronx	NY	10460 US	#######

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Janie Janie	Seguin	ГХ	78155 US	#######
Catherine Clark	Bronx	NΥ	10468 US	########
Jessica Montalvo	Elmira	NY	14901 US	########
Rajdeep Grewal	Concord		94520 US	########
Marie Manuel	Wanaque		7465 US	########
David Saucedo	Denver		80216 US	########
Tracy Pham	Canoga Park		91304 US	########
David Dusseault	Taunton		2780 US	#######
VICTOR GONZALEZ	Las Vegas		89103 US	#######
lea molina	Manteca		95337 US	########
Lisa Mitchell	Sacramento		95820 US	########
Truong Pham	Atlanta		30354 US	########
lexi lockard	London		40741 US	########
Arely Soto	San Luis Obispo		93401 US	########
Karen Leon	Calexico		92231 US	########
Nikiya Lester	New Haven		6511 US	########
Victor Perez	Stockton		95206 US	########
Nancy Wilson	Tempe		85283 US	########
Tyler Thatcher	Toledo		43615 US	########
Dj bennett	Lees Summit		64081 US	########
Martha Gutierrez	Garland		75040 US	########
Grant Yonamine	Lake In The Hills		60156 US	#######
Julius Luna	Chicago		60609 US	########
Um Yah	Boi		V3S US	######## #########
Jennifer Santos	New York	NY	10468 US	########
Joanna Vaquerano	Bronx	NY	10468 US	######### #########
Yusuf Tillery	Hollywood Beach		32217 US	########
Tammy Donnally Mejias	Lake Worth	FL	33460 US	########
L Kal	Atlantic Highland		7716 US	########
Jessica Ruiz	Washington	DC	20011 US	#########
Anthony Rodriguez	Newark	NJ	7104 US	########
Kabra Taylor	Odessa	TX	79764 US	########
Sherron Parker	Odessa	TX	79764 US	########
Damien Aura	Bronx	NY	10469 US	########
Roxanne Perez Paul	New York	NY	10029 US	########
Jamele Baez	Bronx	NY	10460 US	########
David Rosario	Philadelphia	PA	19128 US	########
Stephanie Lucas	Washington	DC	20011 US 10468 US	########
Dinean Spaulding	Bronx	NY		########
Lisa Mathis	Bronx	NY	10456 US	#######
Latoya Neal	Bronx	NY	10468 US 38101 US	########
Brandi Leonard	Memphis			########
Christopher Pagano	Newark	NJ	7103 US	########
Carlos Delvalle	Bronx	NY	10466 US	########
Neysa Cuilan	New York	NY	10022 US	########
Chantel Tyler	Richmond	VA	23223 US	########
John Manning	Bentonville	AR	72712 US	ппиппипп

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Layla Cuilan	New York	NY	10016 US	########
Tiffany Thompson	Bronx	NY	10475 US	########
Amanda Mbaye	Roxbury	MA	2119 US	########
RODLIN GELIN	Miami	FL	33161 US	######## #########
Chris Davis	Bronx	NY	10461 US	
Naomi Smith	New York	NY	10022 US	########
David Graham	Bronx	NY	10459 US	######## #########
Erick Olivera	Springfield	MA	1101 US	######################################
Fitzroy B.	Jersey City	ΝJ	7305 US	########
Khalil Abbas	Richmond	VA	23225 US	########
rosa Maldonado	New York	NY	10473 US	########
Etoya McFadden	Huntersville	NC	28078 US	########
Jasiya Johns	Medford	NY	11763 US	######################################
Rafael Gomez	Bronx	NY	10463 US 28027 US	######################################
Taj ISo	Concord	NC		########
Ashley Marie	Brooklyn	NY	11233 US US	########
Diana Lopez			10455 US	########
Marion Carter	Bronx	NY	10455 US 42759 US	########
Carolyn Lynn	Marrowbone		93458 US	########
Sophia Aguilar Blanco	Santa Maria		93456 US 44024 US	########
Jesse Gandolf	Chardon		10457 US	########
Denise Smith	Bronx		33020 US	########
John Mercado	Hollywood		70002 US	########
Desiree Brown	Metairie		19020 US	########
Rasheen Harris	Bensalem		23507 US	########
Kyla Carr	Norfolk		80422 US	########
Kamron Brewer	Gilpin county		84121 US	########
Adam Ginsburg	Salt Lake City		33619 US	########
Royce Bonaventure	Brandon		33813 US	########
RANDY LAWSON	Lakeland		30518 US	########
M Graves	Buford		24073 US	########
Tanner Linkous	Christiansburg		11206 US	########
Grace Robinson	Brooklyn		46226 US	########
T TYSON	Indianapolis Boise		83704 US	########
Erin Stark		NY	10452 US	########
Edgardo Alvarez	Bronx ny Marlton	NJ	8053 US	########
Marissa Sangiuolo	Nashville	145	37206 US	########
Jasmine Britton	Charlotte	NC	28211 US	########
Ray Oglesby	Bronx	NY	10457 US	########
Jamel Young	Bronx	NY	10457 US	########
Bianca Bonilla	Fort Lauderdale		33317 US	########
Maurice Biart CasSandra Batchelor	Independence	MO	64052 US	#######
	Tacoma	WA	98404 US	#######
misty winterton	Springfield	MA	1101 US	#######
Eneyda Cardona Shanon Gordon	Bronx	NY	10460 US	#######
	Leesburg	AL	35983 US	5/1/2020
Derek Rowley	Eccopurb			

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Jaime Santiago	Bronx	NY	10468 US	5/4/2020
Dashley Pena	Bronx	NY	10455 US	########
Melissa Ovalles	Bronx	NY	10457 US	########
Tony Smalls	Asheville	NC	28804 US	########
Jason Lloyd	New York	NY	10027 US	########
Micharl Akosa	Mount Vernon	NY	10550 US	########
Andy Lopez	Bronx	NY	10466 US	########
DD	Bronx	NY	10460 US	########
Letha Williams	Bronx	NY	10456 US	########
Adoniz Cruz	New York	NY	10118 US	########
Shaquille Scott	New York	NY	10029 US	########
Olatunde Elumade	Valley Stream	NY	11580 US	#######
Joshua Rios	Bronx	NY	10457 US	########
Matthew Kelly	Pawtucket	RI	2861 US	########
Jose Lopez	Bronx	NY	10458 US	#######
Ravon White	Jewett City	CT	6351 US	########
Shy Fernandez	Bronx	NY	10456 US	########
Khris Williams	New York	NY	10022 US	########
Mel Brown	Bronx	NY	10462 US	#######
Gary Reid	New York	NY	10027 US	########
Micheal Smith	New York	NY	10002 US	#######
Kevin Green	Missouri City	TX	77459 US	########
Albert Tello	New York	NY	10118 US	########
Anais Caba	Bronx	NY	10456 US	########
Samary Aguilera	Bronx	NY	10468 US	########
Kimberly Pena	Norwalk	CT	6850 US	########
Rodney Exum	Bronx	NY	10457 US	########
Aquiles Sanchez	Bisonó			can ########
Pedro Robles	Miami	FL	33142 US	########
Vanessa A	Raleigh	NC	27609 US	########
idair melendez	New York	NY	10027 US	########
Elizardo Vargas jr	Bronx	NY	10462 US	#######
Erica Cruz	New York	NY	10118 US	########
José Adams	Newark	NJ	7104 US	#########
Zulma Santiago	Stamford	CT	6902 US	########
Danny Norfleet	Greenville	NC	27834 US	#########
Unique Christopher	Bronx	NY	10453 US	########
Charles Patterson	New York	NY	10118 US	#########
Avery Davila	Cleveland	OH	44102 US	#######
Johnny Moorer	Elkridge	MD	21075 US	########
Rosa Hernandez	Bronx	NY	10457 US	#######
Lily Gonzalez	Philadelphia	PA	19121 US	#######
Lateef Adeyinka	Lancaster	PA	17602 US	#######
Laisha Gomez	Bronx	NY	10473 US	#######
Shannon Agosto	New York	NY	10016 US	#######
Jade Fuller	Langhorne		19047 US	#######
Josheal Cruz	Bronx	NY	10472 US	#######

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Carlos Saltares	Houston	TX	77055 US	########
Justine B	Buffalo	NY	14214 US	########
Jon Valentine	Bronx	NY	10453 US	########
Tom Partosh	Rockville		20852 US	########
CRAIG Griffin	Dallas	ΤX	75150 US	########
Ashlee Retherford	Augusta		30434 US	########
Aizeyah Castañeda	Kissimmee		34741 US	########
Darrel Wood	New York	NY	10030 US	########
Lisa Halpern	Santa Ana		92704 US	########
Natasha Casanova	New York	NY	10118 US	########
Darius Byrd	Tampa	FL	33617 US	#######
Daddy Dix	Lebanon		8833 US	########
Penny Candelaria	Bronx	NY	10463 US	########
Andre Watkins	Bronx	NY	10458 US	#######
Valery Cabrera	Bridgeport	СТ	6606 US	########
Geovani Duran	Bronx	NY	10457 US	########
Teresa Munoz	Marrero	LA	70072 US	########
Tisha Beacrucis	Bronx	NY	10473 US	########
	New York	NY	10023 US	########
Kaye Rosado Jeni Funderburk	New York	NY	10118 US	########
*	Tampa	FL	33607 US	#######
Angel martinez	New York	NY	10022 US	########
Issac Santiago	Bronx	NY	10457 US	#######
Roberto Franco	Houston	ΤX	77042 US	########
Shaniqua Mcmillian	Bronx	NY	10453 US	########
Christopher Grant	Charlotte	NC	28277 US	########
Troy Conyers	Harrison	NJ	7029 US	########
Davon Yarborough	White Plains	143	10601 US	########
Jasmine Santos	******	NY	10460 US	########
Jasmin Aviles	Bronx	GA	10459 US	########
Ron james	New york	CT	6902 US	########
Jacqueline Everett	Stamford	NY	10468 US	########
Stephanie Santiago	Bronx		10451 US	########
Syeda Sgs	Bronx	NY	32808 US	#########
Luis Torres	Orlando	FL	10457 US	########
Chandra Boyce	Bronx	NY	10457 US	#######
Jahsun Campbell	Bronx	NY	7055 US	########
Eddie Molina	Passaic	NJ	10462 US	########
Pia Sicardo	Bronx	NY	10462 03 10118 US	########
Mekhi Jones	New York	NY		########
Justin Perrin	Bronx	NY	10467 US	#######
Addiict GfX	District Heigh	nts	20747 US	########
Ashley kennard	Chicago		60634 US	########
Crystal Crenshaw	New York	NΥ	10118 US	########
Velvet Bill Williams	Bronx	NY	10460 US	######## #########
Shandon Jackson	Cheyenne		US	
Carlos Cardona	Orlando	FL.	32801 US	########
Markitta Whitney	Yonkers	NY	10701 US	#######

Jessica Soto	Spring Hill	FL	34609 US	########
Gerald Gomez	Bronx	NY	10460 US	########
Kennedi Garrett	Indianapolis		46214 US	########
Maggie Neumann	Cincinnati		45242 US	########
Tamara Bell	Lawrenceville	GA	30046 US	########
Elijah Rowell	New York	NY	10118 US	########
Juan Neri	Santa Ana	CA	92703 US	########
Anthony Lopez	New York	NY	10022 US	########
Constantine Gonzalez	Bronx	NY	10452 US	########
Pedro Sanchez	Bronx	NY	10458 US	########
Morrell Thomas	New York	NY	10029 US	########
Nahdia Matthews	Bronx	NY	10460 US	########
Darryl Nickey	New York	NY	10118 US	########
Marisol Torres	Bronx	NY	10458 US	########
Arturo Abrahante	Philadelphia	PA	19124 US	########
Savannah Torres	Schenectady	NY	12309 US	########
Monasia Bellamy	Durham	NC	27703 US	########
Josephine Colon	Bronx	NY	10460 US	########
Farshad Nader	Los Angeles		90020 US	########
Sabrina Mateo	Torrington	CT	6790 US	########
Geraldine Rodriguez	Bronx	NY	10460 US	########
Jessica R.	Bronx	NY	10452 US	########
Tiffany Bowie	Bronx	NY	10475 US	########
Robert Calcano	Yonkers	NY	10705 US	########
Todd VerHage	Jenison		49428 US	########
Rosa Martinez	Bronx	NY	10453 US	########
Shanaz Saunders	Bronx	NY	10460 US	########
Jerry Fig	Wappingers Falls	\$	12590 US	########
Carl David Thielo	Cincinnati		45219 US	########
Maribel Marulanda	New York		11106 US	########
LorenzO Gonzalez	Reading	PA	19610 US	########
Julyssa Inoa	Bronx	NY	10454 US	########
Veronica Colon	Bronx	NY	10462 US	########
Laura Sorenson	Crosby		77532 US	########
kayda bucks	Kansas City		64152 US	########
S Taylor	Brooklyn	NY	11212 US	########
Evelyn Walker	Brooklyn	NY	11207 US	########
Carlos Rodriguez	Bronx	NY	10456 US	########
Jann Lame	Broomfield	CO	80020 US	########
Lezlie Gomes	Chandler		85286 US	########
Kenya Jackson	Pittsburgh		15227 US	########
Роор Воу	Whitestone		11357 US	########
Howard Wilson	Bronx	NY	10456 US	########
Oscar Tinajero	Okeechobee	FL	34974 US	#######
Sylena Williams	Memphis		38116 US	########
Frankie Doner	Omaha		68105 US	#######
Veronie Poteat	Long Island City	NY	11101 US	#######

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Leiani Park	Bluffton	SC	29910 US	########
Debby Willette	Greencastle		46135 US	########
Angela Phifer	Dallas		75270 US	########
Samantha Franklin	Stockton		95207 US	########
Bermary Molano	Houston		77008 US	########
Frank Alicea	South Ozone Park	NY	11420 US	########
Lamonique Allen	Harker Heights		76548 US	########
Bar Thom	Brooklyn	NY	11233 US	########
Bobby Hyde	Bronx	NY	10469 US	#######
Alison Rivera	Gaithersburg		20878 US	########
Colby Hall	Akron		49415 US	########
Samad Az-Azhir Azwad-Mu	Mason		45040 US	#######
Chip Snively	Pittsboro	NC	27312 US	########
Jyzaiah Graham	Jacksonville		32219 US	#######
Virginia Myers			US	########
Brent Stewart	Bloomington		61704 US	########
Alice Nush	Merced		95340 US	########
Liyah Kenns	Philadelphia		19124 US	########
Jeffrey O'Brien	Los Angeles		90047 US	#######
Valerie Hopkins	Chicago		60617 US	########
NICOLE DeGRATE	Bridgeport		6610 US	########
Wayne Tubbs	Centerville		75833 US	#######
Ibrahim Alim	Cleveland		44128 US	#######
Srinivas Chavala	Maryville		64468 US	#######
Robert LEYVA	New Braunfels		78130 US	########
Mariana Serna	Tampa		33614 US	########
Jada Mclean	Capitol Heights		20743 US	#######
Bella Del carpio	Germantown		20874 US	########
Nora Babcock	Canby		97013 US	########
Daniel Regan	Silver Spring		20901 US	########
Gene Birger	Los Angeles		91302 US	########
Lisa Tolliver	Bronx	NY	10457 US	########
Donnell Gravette	Schenectady	NY	12304 US	########
Lindsey Warzala	Saint Paul		55113 US	########
Steven Rodriguez	El Paso	TX	79938 US	########
Rachel Zhao	Providence		2909 US	######## #########
marc zajac	Lynnwood		98037 US	#########
Megan Smith	Greeneville		37745 US	########
Trevor Gray	Enosburg Falls	VT	5450 US	########
Rafael Gamez	New York	NY	10118 US	########
Romell Mitchell	Detroit		48204 US	########
LaRon Young	Greenville		29644 US	########
Michele Patterson	Georgetown		78628 US	########
Trecia Coleman	Dorchester Cent	er IVIA	2124 US 98118 US	#########
Rafia Shakil	Seattle		98118 US 78620 US	########
2020 TX-LIBERTARIAN PR			32836 US	########
Frances Cruz	Orlando		32650 03	11 H H H H H H

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Dupree Pinckney	Brooklyn	NY	11233 US	########
Lorice Edmonson	Hyannis	MA	2601 US	########
Geordan Mustain	Lathrop ca. 95330		94109 US	#######
georgina mattern	Moscow		18444 US	########
Kara Muscha	Opelika		36804 US	########
Kathy watson	louisville		40219 US	########
•	winnemucca		89445 US	########
Patty Bostelman	Hendersonville		28739 US	########
Timothy Rock	Muskegon		49445 US	########
Nina Smith	Philadelphia	PA	19140 US	########
Ricky Isaac	Mckinney	173	75072 US	########
Suzy Givens	· · · · · · · · · · · · · · · · · · ·		90002 US	########
Luz Vasquez	Los Angeles	NY	10458 US	########
Maleek Beguesse	Bronx	OH	43725 US	########
Alsean Washington	Cambridge		11746 US	########
Oli Beck	Huntington Statio		32701 US	########
Ashley Christine	Altamonte Spring		12528 US	########
Patricia Cruz	Highland	NY	95131 US	########
Erika Cabrera	San Jose			########
Mitch Bretz	Wetumpka		36092 US	########
Avis Corson	Philadelphia		19104 US	
Alyssa Weaver	Otway		45657 US	########
Gina roman	Bronx	NY	10467 US	########
Linda Lyall	Lancaster	PA	17603 US	########
Donyelle Rosborough	Reston		20194 US	#######
Brandon Emilien	Houston		77067 US	#######
Carol J.	Opa Locka		33055 US	########
Danielle Barden	Detroit		48213 US	########
Gladys Torres	New Castle		19720 US	########
Sabrina Patterson	Douglasville		30134 US	########
Aditya Sethunath	Beaverton		97007 US	########
Liam Pummer	Aurora		60502 US	########
simone s	Detroit		48322 US	########
Jori Toepper	Pontiac		61764 US	########
George Young Jr.	Staten Island		10303 US	########
Karen Angel			US	########
Harlee Richardson	New York	NY	10118 US	########
Jason Jarvis	New York	NY	10118 US	#######
Luis Dejesus	Bronx	NY	10468 US	########
•	Rutherford	NJ	70 <b>7</b> 0 US	########
Christina López	Philadelphia	PA	19121 US	########
Jerry Murat	New York	NY	10128 US	########
Thaddeus Johnson	Queens	NY	11358 US	#######
Kristina Pagan		VA	22192 US	########
John Barber	Woodbridge	NY	11236 US	########
Jason Sawyer	Brooklyn	INT	32606 US	########
Alexander Ortiz	Gainesville		30038 US	########
Tyrone Major	Lithonia	6137	10118 US	#########
Keisha Walker	New York	NY	10110 03	

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Kelly Bell	Chicago Heights		60411 US	########
Jaquan Lapierre	Asheville		28801 US	########
Deja Adams	Rockledge		32955 US	########
Siroc Mafia	New York	NY	10037 US	########
Armel Murph	Brooklyn	NY	11232 US	########
Todd Gaston	Harrison	NJ	7029 US	########
Tawana Garcia	New York	NY	10002 US	########
Devon Smith	Seattle		98125 US	#######
Jasmine Garcia			US	########
Ashley Hite	Linden		36748 US	########
FREDERICK JONES	Queens		11378 US	########
sue garrity	Uncasville		6382 US	########
Demetria Barrow	Greenville		38701 US	########
skylar brown	great mills		20634 US	########
Safaa Landry	Elmsford		10523 US	########
Paola Alquicira	Houston		77005 US	########
Daijalyn Lopez	Oakland		94608 US	########
Emmett Svendsen	Bronx	NY	10456 US	########
A Cabo	West Hartford	CT	6117 US	########
	Salisbury		28147 US	########
Deisa Godfrey	Las Vegas		89131 US	########
Kathy Bufford	Moore Haven		33471 US	#######
Caydence Cisneros	Waldorf		20603 US	#######
George Benjamin	Pasadena		77506 US	########
Emily Castro	Carmichael		95608 US	########
Sequoia Brown	Bronx	NY	10465 US	########
Raven Sauri	Minneapolis	141	55403 US	########
Hanna Stier	Austin		78732 US	########
lily ostlund	Philadelphia		19129 US	########
Aliyyah Miller	Indianapolis		46227 US	########
Dalton Grigsby	mulanapons		US	########
Millie Daugherty	Duamy	NY	10473 US	########
Maria Flowers	Bronx	NY	10456 US	########
Jermaine Davis	Bronx	NY	10452 US	########
Trevor Cummings	Bronx	NY	10468 US	########
Yuliana Hernandez	Bronx	NY	10451 US	6/1/2020
Ramel Bethel	Bronx	INT	35765 US	6/3/2020
Oliver White	Pisgah	NY	10475 US	6/4/2020
Natalie Cruz	Bronx		32218 US	6/5/2020
Christine Hernandez	Jacksonville	FL	13850 US	6/5/2020
Latisha Spruill	Vestal	NY	33695 US	6/6/2020
Cynthia Pittman	Tampa	FL	33302 US	6/7/2020
Stacey Frierson	Fort Lauderda			6/9/2020
sebastian Brundage	Brooklyn	NY	11207 US	6/9/2020
Taylor Morrison	Fort Myers		33919 US	6/9/2020
Emily De Leon	Coral Springs		33065 US	6/9/2020
Lauren Degray	Goodyear		85395 US	6/9/2020
Meg Middleton	Round Rock		75535 US	0/3/2020

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kianna arthur	Milwaukee		53208 US	6/9/2020
Galilee Mora	Lake Elsinore		92532 US	6/9/2020
Paige Boggs	Rockland		2370 US	6/9/2020
Andrea Simpson	Des Moines		50317 US	6/9/2020
Dianni Forland	Saint Louis		63108 US	6/9/2020
Madison Irons	Napa		94558 US	6/9/2020
Sean Evans	Dallas		75229 US	6/9/2020
Daisy Henriquez	Los Angeles		90044 US	6/9/2020
Davia Wynn	Sioux City		51103 US	6/9/2020
Diamond B	Washington		20002 US	6/9/2020
Corey Liew	San Jose		95141 US	6/9/2020
Timothy Desiderio	Staten Island		10309 US	6/9/2020
Edward Folk	Oceanside	NY	11572 US	6/9/2020 ########
Algelis Tatis	Bronx	NY	10451 US	
Joni Jones	Bronx	NY	10452 US	########
Katerina Aquino	Lansing		48915 US	########
Jasmine Lopez	New Rochelle	NY	10804 US	########
Alex Gonzalez	Bronx	NY	10456 US	######## #########
Tiffany Lee	Chandler	ΑZ	85226 US	######################################
Jamie Sell	Warren	ОН	44483 US	########
Arvett Barnett	Chicago	IL	60644 US	#########
Jennifer Wilson	Augusta	GA	30904 US	######################################
Shandiya Bynum	Lawrence Towns		8648 US	
Melissa Staton	Toledo	ОН	43614 US	######## #########
Nicole Cintrón	New York		10003 US	########
Ashley Franklin	Elizabethtown		42701 US	########
Sanieka Glasper	Vicksburg		39183 US	########
Rachel Yost	Austin		78704 US	########
Ellie Jaenke			US	########
Shirley Romero	Hawthorne		90250 US	########
MJ S	Harwich		2638 US	########
Sarah Allison	Asheville		28806 US 8854 US	########
Colleen McGeorge	New Jersey			######################################
Lauren Shovelson	Luck		54853 US	########
Vanesa Jaramillo	conshocken		19462 US 11436 US	########
Melanie Calderon	Jamaica		91614 US	########
Haley Vasser	Studio City		91614 US 92231 US	########
Nicole Garcia	Calexico		48186 US	########
Tianna Lanier	Westland		92254 US	########
Maria Valencia	La quinta		92234 US 10452 US	7/3/2020
Amber Smith	Bronx	B 13 /	10452 US	7/4/2020
Melvalyn Quinones	Bronx	NY	wa9 3xa UK	########
Nicola Pennington	Saint Helens	ENG	32822 US	########
Rhonda Williams	Orlando	FL	91352 US	#######
johan dixon	Sun Valley	CA	60632 US	########
Frank Hogan	chicago	IL MD	21703 US	########
Ruben Dimo	Frederick	MD	21/03/03	** 11 11 21 12 27 46 14

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Yasmin Rodriguez	New Orleans	LA	70119		########
louise Louis	Florida	FL	FI 32809	US	########
Janet Lee Walton		VA	24426		########
Alexa Conner	Dover Foxcroft	ME	4426		8/1/2020
Tiffany Brown	New York	NY	10027		8/6/2020
Jamie White	Bronx	NY	10468		8/6/2020
Velda Whitfield	New Bern	NC	28560		8/6/2020
Angela Fernandes	Bella Vista	AR	<b>7</b> 2714		8/6/2020
Kayla Newhouse	South Charleston	WV	25309		8/6/2020
MARIE RIVAS	New York	NY	10029		8/6/2020
Felicia White	Lithonia	GA	30058		8/6/2020
Isadora Valerio	Queens	NY	19605		8/6/2020
ANNETTE SIMON	Rochester	NY	14609		8/6/2020
Jennifer Van Atta	Los Angeles	CA	90096		8/6/2020
Natalie G	Goodyear	ΑZ	85338		8/6/2020
ana santiago	bronx	NY	10452		8/6/2020
Charlotte Loof	Tholen		4691 LR		8/6/2020
Raven Velez	Bronx	NY	10452		8/6/2020
Anabel Ramirez	Bronx	NY	10469		8/6/2020
Jennifer Burgos	Bronx	NY	10468		8/6/2020
Ellie Fernandez	Bronx		1045	7 US	8/6/2020
David Melendez	Bronx	NY	1045		8/6/2020
Alexus Butler	Plainfield		637	4 US	8/6/2020
Taran Turner	Riverside	CA	9250		8/8/2020
Madison Williams	Fort Worth		7610		8/8/2020
Pamela Higholt	Los Angeles		9160		8/8/2020
Jasmine Carrero	Fort Lauderdale	FL	3332	1 US	8/9/2020
Carole Davis	Cincinnati	ОН	4521		########
Reagan Pinckney	Summerville	SC	2948	6 US	#######
Lila Denning	San Diego		9213		########
Lilah Jacobs	Tulsa	OK	7413		########
Vatis Ruther	Rochester	NY	1462	o us	########
dko Patel	Mt. Juliet	TN		US	########
Justin Murphy	Philadelphia	PA		4 US	########
Emmanuel Sanchez	Brooklyn	NY	1123	3 US	########
Tremaine Brown	Dover	DE	1990	1 US	########
Caple Moodie	Atlanta	GA	3030	)1 US	########
Luis Guerrero	Bronx	NY		4 US	########
Elizabeth Tavares	Bronx	NY	1045	57 US	########
Krystina Rivera	Bronx	NY	1045	58 US	########
Tyreik Williams	Bronx	NY		58 US	########
John Montanez	Silver Spring	MD	2090	06 US	########
L.J. Morgan	New York	NY	101	18 US	#######
Norah Barber	Vestal		138	50 US	#######
Kaela Mcneil	Staten Island		103	12 US	########
Aditya C	Shakopee		553	79 US	########
Jerry Bernard	Brooklyn	NY	112	33 US	#######
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fahad khan	Queens	NY	11355 US	########
Donica Cekaj	Bronx		10469 US	########
Chanta Scott	Charlotte	NC	28273 US	#######
George Adams	Orange Park	FL	32073 US	#######
Dekendra Streeter	Blackville		29817 US	########
Joselynn Lee	Buffalo		14225 US	########
Sophie Frizzell	Bronx		10460 US	########
annie flores	Van Nuys		91405 US	########
Shanta Conner	Bronx	NY	10466 US	########
ivy hall	Chaumont		13622 US	########
kaylee newman	Elon		27244 US	########
Taylor Love	Falmouth		41040 US	########
Nasaly Gallegos	Salinas		93906 US	########
Kennedy Myers	Manistee		49660 US	#######
Tj Tickell	Jacksonville		32081 US	########
Vanessa Hillhouse	Middletown		19709 US	#######
Sarah Conner	Saint Augustine		32080 US	########
Yesenia Hernandez	New York	NY	10040 US	#######
Mariana Ramirez	Beaverton		97008 US	########
Ivan Leguizamo	Los Angeles		90044 US	########
Yes Yes	Worcester		1604 US	########
Shyanne Bulson	Heathsville		22473 US	#######
Jay Galva	New York		10024 US	#######
elizabeth branch	niles		44446 US	########
Christopher Clara	Belmar		7719 US	########
Rachel Harbison	West Melbourne		32904 US	########
Ardis Haskell	Huntsville		35763 US	########
Nicole Faigen			US	########
Gracie D	Detroit		48185 US	########
Abigail Martinez Andaver	d: Ventura		93001 US	#######
Kennadie Hendrix	Mount Sterling		40353 US	#######
Piper Hale	Indianapolis		46260 US	########
emerald green	Locust		28097 US	#######
Edwin Manzo	Sacramento		95842 US	#######
Tamara Hernandez	Columbia		29206 US	#######
William Evans	Enfield		6082 US	########
Emilia Sheridan	Somerville		2145 US	########
Abigail Silva	Gardena		90248 US	########
Marylin Manson	Langhorne		19047 US	########
Beylianis Maldonado	Springfield		1104 US	########
Sasha Mackey	Bellingham		98225 US	#######
Lydia Maru	Garland		75044 US	########
nia sandoval	Riverside		92505 US	#######
christjana wagner	Nevada		64772 US	########
manny 2020	milton		5468 US	########
Dorothy Agbame	Alpharetta		30022 US	#######
Olivia Hansen	Brooklyn		11201 US	########
Olivia Haliseli	Diookijii			

Nicholas Jackson	Mansfield		2048		########
Yasmin Gomez	Lombard		60148		#######
J Villalon	Weslaco		78596	US	#######
Thomas Meiswinkel				US	########
Ava Salcedo	Springfield		1101	US	########
Tobi Prichard	El Cerrito		94530	US	########
Dimitra Giannakopoulos	Chicago	IL	60625	US	########
Sean Morales	New York	NY	10035	US	#######
Salina Leon	Los Angeles	CA	90201	US	########
Gloria Corniel	New York	NY	10021	US	#######
Raynard Hardy	Bronx	NY	10461	US	########
Yael Ben-adi	Henrico	VA	23231	US	#######
Philip P	Philadelphia	PA	19133	US	########
Star Jones	Bronx	NY	10456		#######
Elvis Salcedo	Lancaster	PA	17602	US	########
Tyquawn Priester	Bronx	NY	10463		#######
Lizmary Delacruz	Bronx	NY	10465		########
shishdi shisdhid	Silver Spring	MD	20903		########
Lamont Andrews	Brooklyn	NY	11233		#######
Jose Estrella	Bronx	NY	10460		########
Brenda Gonzalez		NY	10450		########
	Bronx		10452		
Luis Otero	Bronx	NY			########
Jan Murray	Pomona	CA	91767		#######
Jose Reyes	Bronx	NY	10468		#######
Elia Ortiz	Bronx	NY	10457		########
Tania Swani	Katy		77494		#######
Jordan Riley	Chico		95926		#######
Melissa Salazar	West Sacramento	ı	95605		#######
Jamie Caya	Vancouver		98664		########
Samantha Rutzinski	Radford		24141	US	########
kwispy bagel				US	########
nikki tarpley	lvy		22945	US	#######
Alysia Greeen	Ormond Beach		32174	US	########
Lizbeth Rodriguez	Los Osos		93402	US	########
Scarlet Given	Kansas City		66117	US	########
samantha d	San Diego		92154	US	#######
Aaron Cooper	Champlin		55106	US	########
angelique johnical	Rockville		20851	US	########
Matthew Chhunkeo	Hillsboro		97123	US	#######
Shelby Reed	Lancaster		17602	US	#######
Sophie Silverman	Bala Cynwyd		19004	US	#######
Dylan Giles	Meridian Idaho		83646	US	#######
, Yvette Williams	Columbia		29203	US	########
Sema-J James	El Paso		79904		########
kaika lacaden	Honolulu		96819		########
Jennifer Busenbark	Crawfordsville		47933		#######
symphony devine	North Las Vegas		89030		########
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Mae Czaszwicz	Chicago		60655 US	########
Ew EW	Montclair		91763 US	########
Noemi Fortini	Orlando		32812 US	########
Jaden Lewis	Portland		97214 US	########
Jessica Nguyen	San Jose		95116 US	#######
Kylie Spencer-Schell	Collegeville		19426 US	########
Amariah Craig	Uou		48239 US	########
Hong-An Nguyen	Huntersville		28078 US	########
FRANKY AUGUST	Miami		33161 US	########
Amarachi Salawu	Syracuse		13207 US	########
Sarah Mehl	Pooler		31322 US	########
Christina Boyer	Levels		25431 US	########
Donta Moore	Madison		30650 US	########
Andrea Emme	Albuquerque		87102 US	########
Ryleigh Smith	Palatine Bridge		13428 US	########
James Tyson	Cleveland		44125 US	########
Juan Miguel Echevarria	Los Angeles		90096 US	########
Tiana Angelovska	Garfield		7026 US	########
Taylor Samsel	Austin		78758 US	########
tami ojo	Union		7083 US	########
Jessica Sheppard	Sacramento		95828 US	########
Selena Perez	Franklin		2038 US	########
Lily McSwain	Fairfax		22038 US	########
Alvin Riggs	Waycross		31503 US	########
Yareli Hernandez	Center		75935 US	########
Edward Vasquez	Bronx	NY	10468 US	########
livvy winograd	Aliso Viejo		92656 US	9/4/2020
Mika Thrift	Huber Heights		45424 US	9/4/2020
Leyla Rakshani	Orange		92866 US	9/4/2020
Antwan Stubbs	Oklahoma City		73110 US	9/4/2020
Jasmine Jauregui	Bakersfield		93308 US	9/4/2020
Kayla Pena	Elizabeth		7208 US	9/4/2020
Charlie Sanchez	Woodbridge		7095 US	9/4/2020
Taylor Jackson	Sumter		29150 US	9/4/2020
Samanthia Moore	North Little Rock		72116 US	9/4/2020
Christopher Rocha	Pomona		91766 US	9/4/2020
Miranda Wells	Lynchburg		45142 US	9/4/2020
Vanessa Espinoza	Lake Forest		92630 US	9/4/2020
Viola Tekyi	Choctaw		73020 US	9/4/2020
Rhiannon Chance	Lexington		2421 US	9/4/2020
Normeychia Patterson	Fort Mitchell		36856 US	9/4/2020
Aileen Ocampo	Chicago		60602 US	9/4/2020
raika kamalaraj	Groton		1450 US	9/4/2020
betsy kungl	Elmhurst		60126 US	9/4/2020
dylan bailey	Baton Rouge		76010 US	9/4/2020
Rose Baldwin	Atlanta		30301 US	9/4/2020
	Jackson		8527 US	9/4/2020
Rebecca Paneque	Jackson		<del></del>	• •

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Danea Grier	Akron		44312 US	9/4/2020
Natali Ghanbaru	Glendale		91204 US	9/4/2020
Kelsey Watson	Asheville		28806 US	9/4/2020
Sameer Bidessi	Orlando		32801 US	9/4/2020
alex presto	Mission Hills		91345 US	9/4/2020
Natalia Hosana	Chicago		60651 US	9/4/2020
Jack Anderson	Elk Grove		95758 US	9/4/2020
Laila Dean	Hampton		23666 US	9/4/2020
Kelli Lavender	San Marcos		78666 US	9/4/2020
Becca Nagode	Tulsa		74136 US	9/4/2020
Amariyon Lee	Chicago		60602 US	9/4/2020
Jessica Valenzuela	Salinas		93906 US	9/4/2020
Christy Dasilva	Las Vegas		89141 US	9/4/2020
Angie Uribe	Las Vegas		89109 US	9/4/2020
tyler b	atlanta		90013 US	9/4/2020
Yaretzi Guzman	El Paso		79936 US	9/4/2020
kenya alvarado	San Antonio		78245 US	9/4/2020
lexi tucker	Arlington		22206 US	9/4/2020
Maisey Kleinmaier	Noblesville		46062 US	9/4/2020
Sarah Warren	Hot springs		71913 US	9/4/2020
Caroline Brown	Atlanta		30319 US	9/4/2020
Amina Syed	Hicksville		11801 US	9/4/2020
Anisa Sahib	Tracy		95376 US	9/4/2020
Zacharey Foxworth	Riverview		33578 US	9/4/2020
Génesis Caldera	Houston		77018 US	9/4/2020
Keara O	New York		10016 US	9/4/2020
Christian Martinez	Carpentersville		60110 US	9/4/2020
7	Allentown		18072 US	9/4/2020
Kylie Wedge Tamica Nelson	Pittsburgh	PA	15206 US	9/6/2020
Clareese Freeman	Sacramento	CA	95819 US	9/7/2020
	Manchester Tov		8759 US	#######
Omar Berrios	Bronx	NY	10451 US	########
Algelis Tatis	Shirley	NY	11967 US	########
Samantha Streeter	Minneapolis	MN	None US	########
Ava Berreau	Atlanta	GA	30317 US	########
Madison Ford	Garfield	NJ	7026 US	########
Joey Dipsey	Bronx	NY	10463 US	########
Yajaira Rosario	Bronx	NY	10468 US	########
Xiomara Rodriguez	Sayreville	ΝJ	8872 US	########
Cheryl Pedota	Alexandria	VA	22304 US	########
Joshua Briscoe	Lithonia	GA	30038 US	#######
Hezekiah Swanson	New York	NY	10118 US	#######
Raymel Garcia		NY	10460 US	#######
Abigail Perez	New York	NC	27615 US	########
Jason Smith	Raleigh	NY	10473 US	#######
Helen Naveo	Bronx	NY	10479 US	########
Chris Nelson	Bronx	VA	23513 US	########
Wajeeh Baker	Norfolk	٧A	23313 00	

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Sean sprinkle	Albany	NY	12203 US	########
Everything Whoopty	New York	NY	10459 US	########
anthony hernandez	Bronx	NY	10459 US	########
Jose Olmeda	Lebanon	PA	17046 US	########
Madeline Stinson			US	########
Rishawn Springer	New York	NY	10118 US	########
David Stewart	Bronx	NY	10456 US	########
Tiffany B	Bronx	NY	10452 US	########
Alana Farmer	Knightdale	NC	27545 US	########
Vitrina Fitzgerald	Yonkers	NY	10701 US	########
Troy Duncan	Mahopac	NY	10541 US	########
Michael Goldston	Goshen	NY	10924 US	#######
Roy Moreira	Red Lion	PA	17356 US	########
Tamika Harper	Atlanta	GA	30314 US	#######
Jahrell Brown	New York	NY	10118 US	#######
ANTHONY VELEZ	Queen Creek	AZ	85142 US	########
Erin Uthe	White city	OR	97503 US	########
Latasha Cargo	New York	NY	10027 US	########
Rhondell Williams	Rochester	NY	14620 US	########
Jerrell White	Bronx	NY	10454 US	########
Shaheem Langley	New york	NY	10025 US	########
Gail Mc donald	Bronx	NY	10452 US	########
Charles Faison	New York	NY	10026 US	########
Qua Stacks	New York	NY	10027 US	########
Aimey Giacinto	Alexandria	VA	22315 US	########
Carol Doreen	Sharon	PA	16146 US	########
Gwendolynn Timothy	East Orange	NJ	7017 US	########
Herndon Steele	Middletown	DE	19709 US	########
Xanti Lou	Atlanta	GA	30318 US	########
Natarsha Austin	Baltimore	MD	21230 US	########
samaya fedd	Baltimore	MD	21206 US	########
Victor Banks	Baltimore	MD	21230 US	########
Nia May	Russellville	AR	72801 US	########
Angelie Figueroa	Virginia Beach	VA	23464 US	########
Jamel Deanne	Teaneck	NJ	7666 US	########
Angelique Chaparro	Kingston	PA	18704 US	########
Danny Dejesus	Bronx	NY	10469 US	########
Luis Matias	Bronx	NY	10457 US	########
******	San Bernardino		92410 US	########
neisa chambers	Phoenix		85012 US	########
Keiji Castro	~		US	########
Rimma Morozova	Gainesville		32608 US	########
Karizma Ramirez	Bakersfield		93306 US	########
Joshua Santamaria	Gi		68577 US	########
Ryan Aldous	Vancouver		98682 US	########
Linda Luxenberg	Stowe		96150 US	
Lexie Gomez	Los Angeles		90001 US	########

Laurel Iseminger	Benton Harbor		49022	US	#######
Mia Nevins	Monongahela		15063	US	########
kaya trout	Chillicothe		45601	US	########
Ntombizodwa Winniefred	Polokwane			US	########
Gonzote Elver	Los Angeles		90011	US	########
Rondane Hollar	Bronx	NY	10467	US	########
Gary Thaler	Boston	MA	2115	US	########
Kelci Ross	White City		66872	US	#######
Janice Fox	Appleton		54911	US	########
Isabella Gutierrez	Visalia		93291	US	########
Khushi Prabhakar	Monroe		10950	US	########
Michelle Hernández	San Antonio		78224	US	########
Lily Estep	Charleston		25306	US	########
Alexa Estrada	Glendale		85302	US	########
Latysha Wilkerson	Marion		28752	US	########
Kyra Knox	Marysville		43040	US	#######
samara ruiz	Houston		77073	US	#######
Sara Brennan	foxboro		2035	US	#######
Nikki Vataha	Show Low		85901	US	#######
Mia Contreras	Turlock		95382	US	########
Abby Hernandez	Orlando		90221	US	########
Riley Jordan	Indianapolis		46231	US	########
serenity johnson	Oklahoma City		73114	US	#######
Kenna History	Lame Deer		59043	US	########
Brianna Gomez	Bolingbrook		60440	US	########
Kayla Horne	Edwards		93523	US	########
Sage Maiava	Kaneohe		96744	US	########
Sukanya Duncan	New York		10003	US	########
Patricia Hodge	Raleigh		27616	US	########
Maliyah Denmark	Ocala		6672	US	########
brianna rojas	Jupiter		33458	US	########
nathalie r	fort myers		33967	US	########
Jennifer Caceres	Bronx		10457	US	########
Jayda Gray	Monroe		28110	US	#######
karolina galarza				US	#######
Jadyn Marks	Archer		32618	US	#######
Hannah Menendez				US	########
Julissa Rocha	Pomona		91767	US	#######
Shirley Juarez	Houston		77081	US	#######
Kemyra Jenkins	Baltimore		21230	US	########
Tera Walker	Hampton		23669	US	########
kendal fahl	Dayton		45458	US	########
Naomi Perez	Detroit		48210	US	########
sterling lawrence	mustang		73064		########
emily cangiano	Hollywood		33025	US	#######
Chloe Justin	Gretna		70056	US	########
Jaymie Conn	Tennessee		37040		#######
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Raymond Muller	Roanoke		24015		########
mika armiento	Keyser		26726		#######
Morgan Williams	Plano		75074		########
JOSHUA Podilla	Des Plaines		60016	US	########
Betania Garcia	Wichita		67212	US	########
Jonathan Ortiz	Bronx	NY	10465	US	#######
LORETTA PADUANO	Sandy Level	VA	24161	US	1/2/2021
Amelia Margita	Fort Worth		76131	US	1/5/2021
Mariah Miler	NORTH CAROLI	NA	28804	US	########
Dylan Guerard	Pennington		8534	US	#######
Bianca Bonilla	Bronx	NY	10452	US	#######
Meah Appleton	Traverse City		49686	US	########
Allison Gomez	Waterbury		6705	US	########
Raquel Toral	Dallas		75217	US	########
Karolin Cruz	Bronx	NY	10456	US	#######
Kyara DeJesus	Brooklyn	NY	11217	US	########
Christopher Baez	Bronx	NY	10451	US	########
Jahmel Sanders	New York	NY	10009	US	########
David Rodriguez	Miami	FL	33177	US	########
Drew Pearson	Monticello	NY	12701	US	########
jesslynn r	Ewa Beach		96706	US	########
madeline nelson	Gastonia		28054	l US	########
Savanna Lau	Brooklyn		11204	l US	#######
Vanessa Osafo	Harrisburg		17111	LUS	########
Jean Chagnon	Montréal		H2K	US	########
Melony Galarza	Brooklyn		11206	S US	#######
Kenneth Sherwood	Buford		30519	) US	########
Jim Lassin	Hollywood		33025	5 US	#######
Gregory Rosales	Houston		77089	9 US	########
Natalie Howard	Westford		1886	5 US	########
anna zhang	Los Angeles		90009	9 US	########
Rita Page	Prichard		36610	) US	########
Sali Vargas	Hamden	CT	6514	4 US	########
Sebastian Valverde	HERSHEY	PA	1.7E+08	8 US	########
Gigi LaBella				US	#######
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